

INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

Bernard H. Riesbeck

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

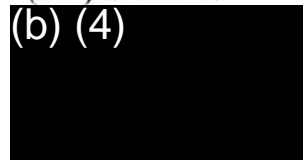
Prepared by:

Chenega Integrated Systems, LLC
4651 Salisbury Road
Quadrant 1, Suite 251
Jacksonville, FL 32256

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
November 14, 2008
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

A large black rectangular redaction box covers the bottom right portion of the page, obscuring the contact information for the Chenega Project Manager and the Interviewer.

Name: Bernard H. Riesbeck (WITNESS)
(b) (6)

Affiliation: Former Employee/Davis Boat Works

Telephone: (b) (6)

Type of Interview: In-Person

Date of Interview: November 11, 2008

On November 11, 2008 the WITNESS was interviewed at his residence by (b) (4)
(b) (4) The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal Site located in Portsmouth, VA (PIM).

The WITNESS explained that he was employed by Davis Boat Works, located at 99 Jefferson Avenue, Newport News, VA, (DBW) from 1982 to 1990. The WITNESS stated that he was employed by DBW as the supervisor of contracts and quality control officer.

When asked to explain the type of business that was conducted by DBW the WITNESS provided the following.

The WITNESS stated that WBD contracted with the Federal Government to refurbish boats. The WITNESS explained that the DBW was able to work on vessels up to 250-tons. The described the types of vessels that DBW refurbished as the following.

- Tug boats
- Barges
- Landing craft

The WITNESS stated that during the time period he was employed by DBW he recalls supervising contracts with the following government agencies. The WITNESS stated that these contracts were to refurbish vessels operated by the following agencies.

- United States Navy: the WITNESS stated that DBW contracted with the United States Navy at the Norfolk Navy Ship Yard located in Portsmouth, VA.
- United States Coast Guard: The WITNESS stated that DBW contracted with the United States Coast Guard located at the Coast Guard 5th District in Portsmouth, VA.
- United States Army: The WITNESS stated that DBW contracted with the United States Army at Fort Eustis, VA.

When asked to explain the refurbishing of these ships, the WITNESS provided the following.

The WITNESS stated that DBW either refurbished or replaced steel plates on the vessels. The WITNESS stated that all electrical components, electrical motors, and generators, in need of repair were subcontracted out by DBW for repair.

When asked the names of the companies that DBW subcontracted to repair and/or refurbish motors and electrical components, the WITNESS provided the following.

- Electric Motor & Contracting Company (EMC): The WITNESS stated that DBW subcontracting to EMC to refurbish electric motors, generators and engines.
- Western Branch Diesel Company (WBDC): The WITNESS stated that DBW contracted with WBDC to refurbish diesel engines.

When asked to explain what type of refurbishing DBW performed the WITNESS provided the following information.

- The WITNESS stated that DBW specialized in steel plate refurbishing or steel plate replacement when needed on the vessels. The WITNESS explained that all of the military vessels were plated with steel inside and outside including the hull of the ships. The WITNESS explained that all of the steel plating on these ships was painted with lead based paint. The WITNESS stated that reusable steel plating was refurbished by DBW by sand blasting the rust and old paint off of the plating and repainting the steel. The WITNESS explained that unusable steel plating was scraped and sold to scrap metal companies. The WITNESS stated that the scrapped steel plating had all been painted with lead based paint.

When asked the names of scrap metal companies DBW sold scrap steel to, the WITNESS provided the following.

The WITNESS stated that DBW maintained a list of scrap metal companies in the area and sent out bids for each vessel DBW refurbished. The WITNESS stated that the contract to purchase scrap metal was awarded to the low bidder.

When asked if the Peck Iron and Metal Company located in Portsmouth was one of the companies that DBW contracted to purchase scrap, the WITNESS stated yes and provided the following information.

The WITNESS stated that PIM was one of the primary scrap metal companies that DBW contracted with. The WITNESS stated that PIM placed large roll-off containers on the DBW Site and all scrap metal was placed in these containers. The WITNESS stated that when PIM had the contract to purchase the scrap metal, PIM removed one full container of scrap each day.

When asked how long PIM would be on Site for each ship contract the WITNESS stated that it would vary from ship to ship. The WITNESS stated that the minimum time to complete work on a ship was one month.

When asked to describe the types of waste that was disposed in the PIM containers the WITNESS provided the following.

- Steel Plating: the WITNESS stated that this steel plating would always be rusted and would have been painted with lead based paint. The WITNESS explained that this steel plating would have been removed from the inside and outside of the ship.
- Aluminum: The WITNESS stated that some of the ships had aluminum hulls and that damaged aluminum was scraped in the PIM containers.
- Steel piping: The WITNESS stated that many of the vessels had steel piping replaced. When asked if any of this piping contained asbestos the WITNESS stated not to his knowledge. When asked if any if this piping was Inconel Pipe, the WITNESS stated that he does not know.

The WITNESS stated that he cannot recall any other type of scrap that was purchased by PIM.

When asked what time periods DBW contracted with PIM, the WITNESS stated that PIM was used during the entire time period the WITNESS was employed by DBW.

When asked if DBW disposed of any liquid waste, the WITNESS stated yes, and provided the following information.

The WITNESS stated that most ships required that all hydraulic fluid be replaced during the refurbishing process. The WITNESS stated that DBW placed all hydraulic fluid in a holding tank on the Site. The WITNESS stated that this liquid waste was removed from the holding tank and taken off of the Site by the following company.

- C&M Distributors.

When asked if DBW ever disposed of transformers, the WITNESS stated no.

When asked if DBW ever disposed of asbestos, the WITNESS stated not to his knowledge.

When asked the names of other scrap metal companies that DBW contracted, the WITNESS stated that he cannot recall. The WITNESS stated that he recalls PIM because PIM was used on a regular basis.

When asked the names of other individuals employed by DBW that may have knowledge of the waste stream at DBW, the WITNESS stated that he cannot recall the names of any other individuals that would have this type of knowledge.

When asked the names of any PIM employees, the WITNESS stated that he does not recall any names.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: No knowledge.
Alcoa (Reynolds): No knowledge.
American Gem Corporation, Chesapeake, VA: No knowledge.
Anheuser-Busch, Inc., Williamsburg, VA: No knowledge.
Argent Marine, Solomons, MD: No knowledge.
Associated Naval Architects, Inc, Portsmouth, VA: No knowledge.
CSX Transportation CO, Charlotte, NC: No knowledge.
Electric Motor and Contracting Co., Chesapeake, VA: See comments above.
Ford Motor Company, Norfolk, VA: No knowledge.
General Electric Company, Richmond, VA: No knowledge.
General Foam Plastics Corp., Norfolk, VA: No knowledge.
General Motors Corporation: No knowledge.
Gwaltney Company, Portsmouth, VA: No knowledge.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: No knowledge.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: No knowledge.
Overhead Door Company, Virginia Beach, VA: No knowledge.
Phillip Morris, Inc., Richmond, VA: No knowledge.
Plasser America, Chesapeake, VA: No knowledge.
Potomac Electric Power Co., Washington, D.C.: No knowledge.
Power Mechanical, Inc., Hampton, VA: No knowledge.
Southeastern Public Service authority, Chesapeake, VA: No knowledge.
Sumitomo Machinery Corp., Chesapeake, VA: No knowledge.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling: Richmond, VA: No knowledge.
Alcatel-Lucent, Murry Hill, NJ: No knowledge.
Brenco, Petersburg, VA: No knowledge.
Carolina Steel Corporation, Greensboro, NC: No knowledge.
Chesapeake, Corporation, Richmond, VA: No knowledge.
Dean Foods, Dallas Texas: No knowledge.
E.I. DuPont de Nemours and Company, Wilmington, DE: No knowledge.

Federal-Mogul Corporation, Southfield, MI: No knowledge.
GATX Corporation, Chicago, IL: No knowledge.
The Hon Company, Muscatines, IA: No knowledge.
IGM USA Inc., Charlotte, NC: No knowledge.
Kraft Foods, Northfield, IL: No knowledge.
Norfolk Southern Corporation, Norfolk, VA: No knowledge.
Pizzagalli Construction Company, Garner, NC: No knowledge.
Schlumberger Industries, Houston, TX: No knowledge.
Seaboard Marine, Miami, FL: No knowledge.
Stanley Hardware, New Britain, CT: No knowledge.
Super Radiator Coils, Richmond, VA: No knowledge.
Waste Management (Chambers Waste Systems of Virginia): No knowledge.
Windor Supply & Mfg., Inc., Tulsa, OK: No knowledge.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS indicated that he was unable to recall the names of any of his fellow employees at DBW who would have relevant knowledge because he has not been in contact with anyone at DBW since 1992.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews: None

INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

David Knittle

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103


Prepared by:

Chenega Integrated Systems, LLC
5911 Kingstowne Village Parkway
Suite 300
Alexandria, VA 22315

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
February 22, 2009
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

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Name: David Knittle (WITNESS)
(b) (6)
Affiliation: Former Employee/Peck Iron and Metal Company
(b) (6)
Telephone:
Type of Interview: In-Person
Date of Interview: February 11, 2009

On February 11, 2009 the WITNESS was interviewed at his residence by (b) (4)
(b) (4) The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) located in Portsmouth, VA.

The WITNESS stated that he was employed by the Electric Motor Company ("EMC") from 1983 to 1996. The WITNESS stated that he was employed by EMC as an electrician.

The WITNESS explained that he was assigned by EMC to PIM as a contract electrician. The WITNESS stated that he worked at PIM during most of his employment with EMC. The WITNESS stated that he was the contract electrician at PIM from 1983 to 1996. The WITNESS stated that he became a full time employee with PIM from 1996 to 1997. The WITNESS stated that PIM closed in approximately 1997.

The WITNESS stated that while employed by PIM from 1996 to 1997 he was the head electrician for Peck. The WITNESS stated that he worked at both PIM and the Peck scrap yard located in Richmond, VA.

The WITNESS explained that he worked on all of the railroad track cranes and electrical motors used throughout the yard at PIM and the Peck scrap yard at Richmond, VA.

When asked the names of businesses whose scrap was purchased by PIM in Portsmouth, the WITNESS stated that he was not involved in the scrap metal business directly and was not

ABB National Industries, Hampton, VA: Cannot recall.
Alcoa (Reynolds): See comments above.
American Gem Corporation, Chesapeake, VA: Cannot recall.
Anheuser-Busch, Inc., Williamsburg, VA: Cannot recall.
Argent Marine, Solomons, MD: Cannot recall.
Associated Naval Architects, Inc, Portsmouth, VA: Cannot recall.
CSX Transportation Co., Charlotte, NC: Cannot recall.
Electric Motor and Contracting Co., Chesapeake, VA: Cannot recall.
Ford Motor Company, Norfolk, VA: Cannot recall.
General Electric Company, Richmond, VA: Cannot recall.
General Foam Plastics Corp., Norfolk, VA: Cannot recall.
General Motors Corporation: Cannot recall.
Gwaltney Company, Portsmouth, VA: Cannot recall.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: Cannot recall.
Overhead Door Company, Virginia Beach, VA: Cannot recall.
Phillip Morris, Inc., Richmond, VA: Cannot recall.
Plasser America, Chesapeake, VA: Cannot recall.
Potomac Electric Power Co., Washington, D.C.: Cannot recall.
Power Mechanical, Inc., Hampton, VA: Cannot recall.
Southeastern Public Service Authority, Chesapeake, VA: Cannot recall.
Sumitomo Machinery Corp., Chesapeake, VA: Cannot recall.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling, Richmond, VA: Cannot recall.
Alcatel-Lucent, Murry Hill, NJ: Cannot recall.
Brenco, Petersburg, VA: Cannot recall.
Carolina Steel Corporation, Greensboro, NC: Cannot recall.
Chesapeake Corporation, Richmond, VA: Cannot recall.
Dean Foods, Dallas, Texas: Cannot recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Cannot recall.
Federal-Mogul Corporation, Southfield, MI: Cannot recall.
GATX Corporation, Chicago, IL: Cannot recall.
The Hon Company, Muscatines, IA: Cannot recall.
IGM USA Inc., Charlotte, NC: Cannot recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Cannot recall.
Pizzagalli Construction Company, Garner, NC: Cannot recall.
Schlumberger Industries, Houston, TX: Cannot recall.
Seaboard Marine, Miami, FL: Cannot recall.
Stanley Hardware, New Britain, CT: Cannot recall.
Super Radiator Coils, Richmond, VA: Cannot recall.
Waste Management (Chambers Waste Systems of Virginia): Cannot recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Cannot recall.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative.

The Witness stated that he did not have much contact with the scrap yard activities and had limited knowledge of the type of scrap and the names of the customers who PIM purchased scrap from.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews:

- [REDACTED]
- [REDACTED]

INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

Elza P. Tyndall

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC
5911 Kingtowne Village Pkwy
Suite 300
Alexandria, VA 22315

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
January 23, 2009
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

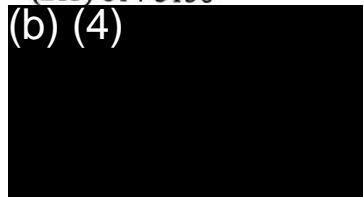
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Exhibit 2

Name: Elza P. Tyndall (WITNESS)

(b) (4)

Affiliation: Former Employee/Electric Motor & Contracting Company

Telephone: (b) (6)

Type of Interview: In-Person

Date of Interview: January 13, 2009

On January 13, 2009 the WITNESS was interviewed at his residence by (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24, the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with the Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by the Electric Motor & Contracting Company ("EMC") from 1964 to 1990 when he retired. The WITNESS stated that he was a service repairman from 1964 to 1983. The WITNESS stated that he became the fleet manager at EMC in 1983 and kept this position until his retirement in 1990.

The WITNESS explained that his association with PIM was as a service repair mechanic. The WITNESS explained that PIM operated a crane with a large magnet attached. The magnet was used to lift scrap metal. The WITNESS stated that he was called out to PIM on numerous occasions to either repair or provide maintenance to the motors on the crane.

When asked if he was aware if EMC sold scrap metal to PIM, the WITNESS stated yes, and provided the following.

The WITNESS stated that EMC was in the business of repairing and refurbishing electric motors. The WITNESS stated that EMC sold complete motors that were irreparable to PIM. The WITNESS stated that when EMC refurbished an electric motor, unusable wires and metal was replaced. The WITNESS stated that unusable metal and wires were sold to PIM. The WITNESS stated that the wires were cooper and the metal was usually tempered steel.

The WITNESS explained that selling this scrap to PIM was a common occurrence during the time he was a repair service mechanic.

When asked to identify where these scrap electrical motors, wire and metal originated, the WITNESS stated that he was aware that many of these electrical motors were from power plants. The WITNESS stated that he cannot recall specific names of these power plants.

The WITNESS was asked if he was aware of any electrical motors still containing liquid when sold to PIM. The WITNESS stated that he would have no knowledge.

The WITNESS stated that some insulation contained in electrical motors could have been asbestos. The WITNESS stated that EMC had a dumpster that was used to collect all insulation. The WITNESS stated that he does not know where this waste was disposed.

The WITNESS stated that many of the electrical motors were from the U.S. Navy.

When asked if EMC repaired electrical transformers, the WITNESS stated yes on a few occasions. The WITNESS stated that EMC refurbished electrical transformers from the following. The WITNESS stated that any scrap generated from the refurbishing of these electrical transformers was sold to PIM.

- Union Camp Paper Mill: The WITNESS stated that EMC refurbished three electrical transformers from Union Camp. The WITNESS stated that any scrap metal generated from the refurbishing was sold to PIM. The WITNESS stated that any liquid in these transformers would have been drained before any scrap was sold.
- U.S. Navy: the WITNESS stated that EMC repaired electrical transformers for the U. S. Navy. The WITNESS had no further information.

The WITNESS stated that he cannot recall any additional companies that EMC refurbished electrical transformers for.

The WITNESS stated that PIM was the only scrap metal company that EMC sold scrap metal to. The WITNESS stated that EMC and PIM had a good business relationship.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: No knowledge.
Alcoa (Reynolds): No knowledge.
American Gem Corporation, Chesapeake, VA: No knowledge.
Anheuser-Busch, Inc., Williamsburg, VA: No knowledge.
Argent Marine, Solomons, MD: No knowledge.
Associated Naval Architects, Inc., Portsmouth, VA: No knowledge.
CSX Transportation Co, Charlotte, NC: No knowledge.
Electric Motor and Contracting Co., Chesapeake, VA: No knowledge.

Ford Motor Company, Norfolk, VA: No knowledge.
General Electric Company, Richmond, VA: No knowledge.
General Foam Plastics Corp., Norfolk, VA: No knowledge.
General Motors Corporation: No knowledge.
Gwaltney Company, Portsmouth, VA: No knowledge.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: No knowledge.
Norfolk Shipbuilding and Dry Dock Co., Norfolk, VA: No knowledge.
Overhead Door Company, Virginia Beach, VA: No knowledge.
Phillip Morris, Inc., Richmond, VA: No knowledge.
Plasser America, Chesapeake, VA: No knowledge.
Potomac Electric Power Co., Washington, D.C.: No knowledge.
Power Mechanical, Inc., Hampton, VA: No knowledge.
Southeastern Public Service Authority, Chesapeake, VA: No knowledge.
Sumitomo Machinery Corp., Chesapeake, VA: No knowledge.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling: Richmond, VA: No knowledge.
Alcatel-Lucent, Murry Hill, NJ: No knowledge.
Brenco, Petersburg, VA: No knowledge.
Carolina Steel Corporation, Greensboro, NC: No knowledge.
Chesapeake Corporation, Richmond, VA: No knowledge.
Dean Foods, Dallas, Texas: No knowledge.
E.I. DuPont de Nemours and Company, Wilmington, DE: No knowledge.
Federal-Mogul Corporation, Southfield, MI: No knowledge.
GATX Corporation, Chicago, IL: No knowledge.
The Hon Company, Muscatines, IA: No knowledge.
IGM USA Inc., Charlotte, NC: No knowledge.
Kraft Foods, Northfield, IL: No knowledge.
Norfolk Southern Corporation, Norfolk, VA: No knowledge.
Pizzagalli Construction Company, Garner, NC: No knowledge.
Schlumberger Industries, Houston, TX: No knowledge.
Seaboard Marine, Miami, FL: No knowledge.
Stanley Hardware, New Britain, CT: No knowledge.
Super Radiator Coils, Richmond, VA: No knowledge.
Waste Management (Chambers Waste Systems of Virginia): No knowledge.
Windor Supply & Mfg., Inc., Tulsa, OK: No knowledge.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interview Summary
Elza P. Tyndall

January 23, 2009
Page 5

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS is (b) (6) The WITNESS stated (b) (6) and cannot recall many of the specifics relating to PIM.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews: None

INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

Billy Boggs

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

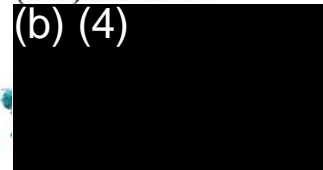
Prepared by:

Chenega Global Services, LLC
726 east 9th Street
Anchorage AK 99501

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
September 29, 2010
EP-S3-09-02
Joan Martin-Banks
(215) 814-3156

(b) (4)

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Name: Billy Boggs ("WITNESS")

(b) (6)

Affiliation: Area Resident and former employee at the Portsmouth Naval Ship Yard

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: September 23, 2010

On September 23, 2010 the WITNESS was interviewed at her residence by (b) (4) (b) (4) Senior Investigator, of (b) (4) The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded. During the course of this interview the WITNESS and Interviewer drove to the corner of Victory Blvd. and Elm Street (The entrance to Peck Iron and Metal) and observed the Site from the public street.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for area residents.

The WITNESS was asked to explain any association he had with Peck Iron and Metal Site located in Portsmouth, VA ("PIM").

The WITNESS stated that he has lived at his current address since 1941. The WITNESS stated that PIM is located approximately four miles from his residence and that he played on the Site many times. The WITNESS stated that he worked at the Navy Ship Yard ("NSY") in Portsmouth from 1960 to 2000 and that the entrance to the NSY is located directly across the street from the entrance to PIM. The WITNESS stated that he drove by the entrance to the PIM every morning and evening he went to work. This gave the WITNESS many years of observations of activities at PIM. The WITNESS stated that he was employed as a machinist during the time he was employed at NSY.

The WITNESS indicated that as a child growing up he and many of his friends played on PIM. The WITNESS stated that he recalls observing ammunition on the PIM property. The WITNESS stated that he specifically recalls picking up a hand grenade on the PIM. The WITNESS stated that this hand grenade still had the pin intact. The WITNESS stated that he threw the hand grenade in a wooded area. The WITNESS stated that he had observed numerous ammunition shells of all sizes with intact projectiles through out the PIM.

When asked to describe his general observations at PIM the WITNESS provided the following.

The WITNESS stated that he recalls that in the approximately 1960s to 1970s Proctor and Gamble ("P&G") had a plant on the PIM property. The WITNESS stated that he had observed a pipe coming out of the main P&G building. The WITNESS stated that this pipe ended at Paradise Creek and that the pipe dumped a white lard type substance into the Creek. The WITNESS stated that this pipe leaked and puddles of the lard substance were seen at many places along the pipe line on PIM.

The WITNESS pointed out a green cement building located on PIM and stated that he had observed numerous 55-gallon steel drums stored in this building. When asked if he recalled any markings or names on these drums the WITNESS provided the following.

The WITNESS stated that he observed drums with the name Sunoco stenciled on the side; The WITNESS stated that he also observed many red and blue drums stored in this building however

When asked the names of the companies who sold scrap metal to the PIM at Portsmouth, or the names of companies that the WITNESS had observed entering the PIM, the WITNESS provided the following.

- General Motors: The WITNESS stated that General Motors stored packaged marine diesel motors at PIM. The WITNESS stated that these motors were used for Navy landing craft. The WITNESS stated that when the Navy shipyard ordered a number of these motors, Peck was responsible to unpack and clean the motors. The WITNESS stated that this packaging included paraffin, oil and an unknown oily substance.
- Alcoa: The WITNESS stated that he had observed Alcoa Aluminum trucks enter PIM containing aluminum and that he observed aluminum on the PIM property.
- EMC Electric Motor and Contracting Company: The WITNESS stated that motors from EMC on PIM.
- General Electric Company: The WITNESS stated that he observed General Electric enter the PIM with open top containers containing boxes of motors. The WITNESS was unable to
- Newport News Shipbuilding and Dry Dock Company ("NNSC"): The WITNESS stated that he had observed NNSC drop off hydraulics systems and catapults at PIM.
- Norfolk Ship Yard: The WITNESS stated that the Norfolk Ship Yard overhauled Navy ships and that Peck received scrap metal from these overhauls.
- VEPCO: The WITNESS stated that he observed VEPCO enter PIM with flat bed trucks and that he had observed transformers on these trucks.

- CSX Transportation: The WITNESS stated that CSX entered the PIM Site on a railroad track spur and that CSX operated both flat bed cars and gondola cars on this spur to enter PIM. When asked the WITNESS stated that he recalls observing electrical transformers on the flat bed cars. The WITNESS stated that he had no information about where these transformers originated.
- Southeastern Public Service Authority ("SPSA"): The WITNESS stated that the property that SPSA is now located was part of the PIM property and was used as part of the PIM operation.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA. The WITNESS stated that he cannot recall the types of scrap that was purchased by PIM. The WITNESS provided the following information.

ABB National Industries, Hampton, VA: Could not recall.

Alcoa (Reynolds): See comments above.

American Gem Corporation, Chesapeake, VA: Could not recall.

Anheuser-Busch, Inc., Williamsburg, VA: Could not recall.

Argent Marine, Solomons, MD: Could not recall.

Associated Naval Architects, Inc, Portsmouth, VA: Could not recall.

CSX Transportation CO, Charlotte, NC: See comments above

Electric Motor and Contracting Co., Chesapeake, VA: See comments above.

Ford Motor Company, Norfolk, VA: Could not recall

General Electric Company, Richmond, VA: See comments above.

General Foam Plastics Corp., Norfolk, VA:

General Motors Corporation: See comments above.

Gwaltney Company, Portsmouth, VA: Could not recall.

Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.

Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.

Overhead Door Company, Virginia Beach, VA: Could not recall.

Phillip Morris, Inc., Richmond, VA: Could not recall.

Plasser America, Chesapeake, VA: Could not recall.

Potomac Electric Power Co., Washington, D.C.: Could not recall.

Power Mechanical, Inc., Hampton, VA: Could not recall

Southeastern Public Service authority ("SPSA"), Chesapeake, VA: See comments above.

Sumitomo Machinery Corp., Chesapeake, VA ("SMC"): Could not recall.

U. S. Navy, Norfolk, VA: See comments above.

AMF Bowling: Richmond, VA: Could not recall.

Alcatel-Lucent, Murry Hill, NJ: Could not recall.

Brenco, Petersburg, VA: Could not recall.

Carolina Steel Corporation, Greensboro, NC: Could not recall.

Chesapeake, Corporation, Richmond, VA: Could not recall.

Dean Foods, Dallas Texas: Could not recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.
Federal-Mogul Corporation, Southfield, MI: Could not recall.
GATX Corporation, Chicago, IL: Could not recall.
The Hon Company, Muscatines, IA:
IGM USA Inc., Charlotte, NC: Could not recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern corporation, Norfolk, VA: Could not recall.
Pizzagalli Construction Company, Garner, NC: Could not recall.
Schlumberger Industries, Houston, TX: Could not recall.
Seaboard Marine, Miami, FL: Could not recall.
Stanley Hardware, New Britain, CT: Could not recall.
Super Radiator Coils, Richmond, VA: Could not recall.
Waste Management (Chambers Waste Systems of Virginia):
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.
AT&T Micro-Electronics: Could not recall
Ball Metal Container, Williamsburg VA: Could not recall
Capitol City Iron Works: Could not recall
Cleveland Wrecking: Could not recall
Continental Can, Hopewell, VA: Could not recall
Davis Boat Works: Could not recall
General Electric, Portsmouth, VA: Could not recall
Gray Metal: Could not recall
Hoechst Celanese, Portsmouth, VA: Could not recall
Keller Industries: Could not recall
L.A. Gentry: Could not recall
Moon Engineering: Could not recall
Nassau Metals: Could not recall
NAITO America: Could not recall
Proctor and Gamble Company: See comments above.
St. Laurent Paperboard Co. (Smurfit-Stone Container): Could not recall
Tyson Foods: Could not recall
Virginia Electric and Power Company (VEPCO): See comments above.
Weidmuller (Mann Industries): Could not recall
Woodington Electric, Virginia Beach/Norfolk, VA: Could not recall.

When asked the names of other employees at PIM the WITNESS provided the following.

- John Meeks

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS stated that because of his interest and profession as a machinist he was very interested in the types of material that Peck dealt in. As such he was probably more observant of activities at PIM than most people.

The WITNESS stated that many other companies dealt with Peck at PIM. He indicated that he will probably recall more names and will contact me with any additional information.

The WITNESS stated that she would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that she does not care.

Suggested follow-up Interviews:

- John Meeks

DECLARATION OF BARRY DAVID PECK

I, Barry David Peck, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 2nd day of June, 2009.

1. I currently reside at

2. I was born on

3. Peck Iron and Metal, Inc. ("Peck Iron") began in Portsmouth, VA in 1945 and in Richmond in 1946. I joined the company in 1959 and moved to Richmond from Portsmouth in 1969. During the previous ten years, I worked in most areas of operations with the exception of general and administrative offices. The work included inspection, material handling, transportation and processing. When I moved to Richmond in 1969, I worked under the various multiple managers who had controlled operations since 1946. As they moved out and retired over the years, I took on more responsibilities for management of the company. In order to deal with contracts and other legal matters, I was made a Vice President of the company, and eventually President. Julius Peck formerly was the sole owner and the President and he was active in management and operations until his retirement in 1994, at which time I became President of the company. Julius Peck recapitalized the company in 1981, when his ownership was converted to preferred stock and the common stock was transferred (one-third each) to his three sons, including me. In 1998, I purchased my brothers' common stock and became the sole stock holder of the company.

4. I am currently the President of The Peck Company, a corporation organized under the laws of Virginia, with a principal place of business of 1500 Huguenot Road, Suite 108, Midlothian, Virginia.

5. I received an Information Request from the Environmental Protection Agency

(EPA) dated January 13, 2006. On behalf of The Peck Company, I executed and submitted to EPA a response to that Information Request written by my legal counsel Dan J. Jordanger (referred to as "the May 10, 2006 letter"). A true and correct copy of the May 10, 2006 letter is attached hereto as Exhibit 1.

6. My father, Julius Peck, founded Peck Iron in 1945, subsequently acting as Chairman of the Board of Peck Iron.

7. Peck Iron previously operated multiple scrap yard operations, including one at 3220 Deepwater Terminal Road, Richmond, Virginia ("Deepwater Facility") and another at 3850 Elm Avenue, Portsmouth, Virginia ("Portsmouth Facility").

8. Julius Peck acquired the Portsmouth Facility from a Mr. Duncan.

9. The Portsmouth Facility originally constituted 15 acres of land. Later land acquisitions from Proctor & Gamble increased the size of the Facility to 33 acres of land.

10. Approximately 8 acres of the Portsmouth Facility were used for scrap processing.

11. The United States Navy ("USN") held an easement on the Portsmouth Facility totaling approximately one acre.

12. The Portsmouth Facility is "U-shaped," as represented by my hand-drawn Facility diagram, a true and correct copy of which is attached as Exhibit 2 to my Declaration. This diagram is my best effort at a fair and accurate representation of the Portsmouth Facility.

13. Julius Peck worked at the Portsmouth Facility from 1945 until it closed in the early 1990s.

14. I worked at the Portsmouth Facility from 1961 to 1969, where I performed many different functions, including driving a truck, sorting scrap, inspecting scrap metal at military customer's facilities, and preparing bids for scrap from military customer's facilities.

15. From 1969 through 1997, I worked at the Deepwater Facility, first as the Manager, then as Vice President, and finally as President.

16. On May 11, 2004, Stephen G. Werner, the Director of Environmental Services for Draper Aden Associates, submitted to Mr. Donald S. Welsh, Regional Administrator of Region III, U.S. EPA, a Self-Implementing PCB Cleanup Plan for the Portsmouth Facility on behalf of The Peck Company. That letter is attached to this Declaration as Exhibit 3. In the May 11, 2004 letter, Mr. Werner provides a history of the property as "summarized by the owner, the Peck Company." The italicized site history contained in that letter was about the operations at the Deepwater Facility in Richmond, Virginia, and not about the operations at the Portsmouth Facility.

17. To the best of my knowledge, the United States Department of Defense never owned or operated the Peck Iron and Metal business on Elm Avenue in Portsmouth.

18. Peck Iron sold the Deepwater Facility to Sims Metal in 1997.

19. At the time of the sale of the Deepwater Facility to Sims Metal, Peck Iron transferred custody of records related to Peck Iron's records, including certain Portsmouth Facility records.

20. William "Bill" Brewster was Office Manager of the Portsmouth Facility of Peck Iron's operations there and during part of the time I worked at the Portsmouth Facility.

21. Certain Portsmouth Facility records were shipped to the Deepwater Facility. Roger Spero, an outside accountant, may have advised William Brewster which documents to send to the Deepwater Facility.

22. In the later years of Portsmouth's operations, the Deepwater Facility handled billing for the Portsmouth Facility. Therefore, invoices from these later years may be in the

records provided to Sims Metal.

23. In the past, upon entering the Portsmouth Facility, you came upon an office building next to a scale. This building was eventually knocked down and replaced with trailers that held records of the operation. To the best of my knowledge, these records have been destroyed and/or lost.

24. I have done a diligent search and, with exception to the records controlled by Sims Metal, I am not aware of any other Portsmouth Facility records.

25. To the best of my knowledge, personnel records for the Portsmouth Facility do not exist.

26. My brother, Aaron Peck, worked as Julius Peck's personal assistant at the Portsmouth Facility.

27. Richard Collins was a crane operator and yard supervisor at the Portsmouth Facility and at another Peck Iron Facility called Pinner's Point, working mostly at Pinner's Point.

28. Pinner's Point was a scrap metal operation owned and operated in the past by Peck Iron on the Elizabeth River in Portsmouth, Virginia.

29. Peck Iron sent marine equipment, including pumps and engines, from USNships, from Pinner's Point to the Portsmouth Facility. The Byrd Corporation purchased and operated the Pinner's Point operation during the 1970's. I believe Byrd was sold to Sims Metal in the 1990's.

30. Peck Iron employed two secretaries and one bookkeeper at the Portsmouth Facility.

31. Rene Gant is a bookkeeper who worked for Peck Iron in 1999 when Peck Iron was audited by the Internal Revenue Service.

32. Approximately 50 yards behind the records trailers identified in Paragraph 23, a 2000 square foot cinder block building was used for the separation of non-ferrous material.

33. An area known as the "shear area" is where scrap containing lead and PCBs was processed.

34. Battery breaking occurred on the Site, but ceased at some point thereafter in approximately the mid-1970s.

35. Materials from battery breaking were collected in drums and battery casings were thrown into piles.

36. One of my duties during the time I worked at the Portsmouth Facility was to "break batteries." Batteries at the Portsmouth Facility were axed or "hatcheted" open and the acid was drained. Also, at times, batteries were crudely opened by melting the edge of the battery box with a torch, and dumping the "guts" of the battery into a drum. A lot of spillage would occur during the process of emptying the batteries. The battery acid ate holes in the workers' pants. The battery casings, which had lead residue, were bulldozed over on the Peck Facility property. Recovered lead would have been placed in drums and sold to a smelter.

37. Sometime in the mid-1970s, battery breaking ceased at both the Portsmouth Site and the Richmond Site. After that point, whole heavy metal or plastic encased batteries were placed outdoors on pallets and shipped to re-processors.

38. Peck Iron unloaded, inspected, prepared scrap from the suppliers then shipped it in trucks, railroad cars and oceangoing ships to various consumers.

39. The scrapping operations at Peck Iron's Portsmouth Facility were handled differently from those operations at the Deepwater Facility.

40. The Portsmouth Facility accepted scrap from various businesses through

contractual agreements. Arrangements were at times initially agreed to over the telephone, but normally were followed up with a written contract or other paperwork.

41. From its inception in 1945, most of Peck's purchases of scrap were from various U.S. Government Agencies, particularly military bases. Purchases usually were from "Defense Surplus Sales" bids, other "RFP"s, and "spot" bids.

42. The USN sent the Portsmouth Facility low-level radioactive material, scrap with PCBs, and other material later found to be hazardous.

43. The USN and other military bases sent rail carloads and truck loads of obsolete, damaged, worn out, surplus, etc. materials to the Portsmouth Facility, including components of airplanes, ships, railroads, vehicles, insulated cables, transformers, weapon systems (including shells), tank parts, etc. All the items contained unidentified attachments, solutions, and materials.

44. Scrap came to Portsmouth from many United States military bases and federal agencies. I recall specifically that the Portsmouth Facility received scrap from Norfolk Naval Shipyard, St. Julian's Creek, Camp Allen, Cheatham Annex, Yorktown, Quantico, Fort Meade, Army, Coast Guard, Naval Air Station, the National Oceanic and Atmospheric Administration, the Maritime Administration, etc. Also, there were regular purchases from Military Bases in North Carolina, Pennsylvania, Maryland and other States.

45. The largest Federal Gov't suppliers of scrap were those that conducted conversion, decommissioning, or demilitarizing of war ships and smaller boats; aircraft repairs; and handled ordnance material.

46. Moon Engineering was a ship repair yard that was not one of the larger suppliers of scrap to the Portsmouth Facility,

47. Virginia Power and Electric Company ("VEPCO") was a large source of scrap for

the Portsmouth Facility.

48. In the late 1940's when Peck Iron received automobiles at the Portsmouth Facility, the normal practice was to rip the tops off and to cut the chasses up into #2 steel. The tops were baled and the motor blocks were broken in order to get the aluminum pistons. This practice ended when Peck acquired more sophisticated equipment.

49. Peck Iron used oil, that may have contained PCBs, to control the dust on the roads at the Portsmouth Facility and burned the oil in drums for heat in the winter.

50. Customers of the Portsmouth Facility dated back to the 1940s and 1950s and may have sent hazardous substances to the Portsmouth Facility in their scrap. Such substances were not known to be hazardous and would be comingled with the other scrap or equipment when delivered to Peck.

51. Scrap recovered from motors at the Portsmouth Facility included armatures with coils.

52. Anheuser Busch, in Williamsburg, sold scrap to Peck. It was delivered to the Deepwater Facility and the Portsmouth Facility.

53. Ford Motor Company, located in Norfolk, Virginia, was a customer of the Portsmouth Facility. Its scrap may have included capacitors with PCBs, asbestos liners, batteries, and truck components containing PCBs, cadmium, zinc, and other heavy metals.

54. Reynolds Metals, now Alcoa, was a major customer of Peck Iron and provided aluminum scrap and other metals that may have contained hazardous material. I believe that some of the Reynolds Metal scrap may have gone to the Portsmouth Facility.

55. Anheuser Busch was a customer of Peck Iron and sent materials to both the Portsmouth Facility and the Richmond Facility. Correspondence from Peck Iron to Dan Kelley

of Anheuser Busch stated that asbestos and lead storage batteries were being sent with their scrap to the Deepwater Facility.

56. Allied Chemical may have sent hazardous substances to Peck Iron.

57. DuPont was a large customer of the Richmond Facility and the Portsmouth Facility. DuPont once sent scrap that contained a drum marked "Radioactive" to Peck Iron.

58. Associated Naval Architects was a ship repair yard that sent scrap to the Portsmouth Facility.

59. CSX was a customer of Peck Iron's Portsmouth Facility from the 1940s to the 1960s. CSX sent large amounts of scrap metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. Someone from the predecessor of CSX was present at the Portsmouth Facility "all the time." CSX sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances. Predecessors of CSX were Seaboard Coastline, Atlantic Coastline, C&O and B&O railroads.

60. Electric Motor and Contracting was an old customer that rewired motors and may have sent scrap with PCBs and asbestos to the Portsmouth Facility.

61. C&P Telephone was an old customer of the Portsmouth Facility that may have sent telephone components to the Portsmouth Facility. Other scrap may have contained hazardous materials (e.g. solvents, coatings, attachments, etc.).

62. General Electric was an old customer of the Portsmouth Facility. General Electric repaired motors and sent damaged components that may have had hazardous substances to the Portsmouth Facility.

63. General Foam was an old customer of Peck Iron.

64. American Brakeshoe was a customer of Peck Iron's Portsmouth Facility that sent components that may have had hazardous substances to the Site.

65. The Portsmouth Facility received large quantities of scrap metal from Delco, a division of General Motors.

66. Gwaltney was a customer of Portsmouth that sent significant quantities of machinery, lubricants, engines, and transformers to the Portsmouth Facility.

67. Newport News Shipbuilding and Drydock ("Newport News Shipbuilding") was an old customer of the Portsmouth Facility (dating back to at least the 1950s and 1960s) that built, repaired and converted Navy ships. In the process of converting Navy ships, Newport News Shipbuilding generated significant amounts of lead, solvents, attachments, coatings, lubricants, cables, gaskets and other materials that may have had hazardous substances that would have gone the Portsmouth Facility.

68. Most companies in the past, including Newport News Shipbuilding, did not empty oil with PCBs from their scrap because the regulations did not require it and perhaps because they received more money from Peck Iron because the scrap would be heavier and they were paid by weight.

69. Norfolk Shipbuilding and Dry Dock ("Norshipco") was an old customer of the Portsmouth Facility (dating back to at least the 1950s and 1960s) that repaired and converted Navy ships. In the process of converting Navy ships, Norshipco generated significant amounts of scrap that may have had PCBs, and other hazardous substances that would have gone to the Portsmouth Facility.

70. Norshipco's scrap sent to the Portsmouth Facility was generated before regulations concerning PCBs went into effect. Most companies in the past, including Norshipco,

did not remove oil with PCBs from their scrap because the regulations did not require it at that point and because perhaps they received more money from Peck Iron because the scrap would be heavier and they were paid by weight.

71. Norshipco also sent to the Portsmouth Facility metals with attachments that may have included asbestos, gaskets with PCBs, coaxial cable which may have contained hazardous substances, "take outs".

72. Overhead Door was a customer of the Portsmouth Facility that sent fabricated sheets and hinges to the Portsmouth Facility.

73. Philip Morris sent scrap to the Deepwater Facility in Richmond, Virginia.

74. Potomac Electric Power was an old customer of Peck Iron's (dating back to the 1950s). Potomac Electric Power disassembled one of its plants, generating scrap that may have had hazardous substances, but I am not certain to which Facility this material was sent.

75. Plasser American was a customer of the Portsmouth Facility and sent scrap there.

76. Southeastern Public Service Authority ("SPSA") had a facility located next to the Portsmouth Facility. Metal scrap was removed from the garbage and trash processed by SPSA and sent to the Portsmouth Facility and hazardous substances may have been included.

77. Sumitomo Machinery was a customer of the Portsmouth Facility that may have sent hazardous substances to the Portsmouth Facility, including gear boxes and electric motors containing PCBs.

78. VEPCO was a very large scrap supplier to the Portsmouth Facility that sent transformers with PCBs and probably other hazardous substances to the Portsmouth Facility.

79. Nassau Metals was a customer of the Portsmouth Facility.

80. GATX was a customer of the Portsmouth Facility that sent large amounts of scrap

metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. GATX sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances.

81. The Hon Company was a customer of the Deepwater Facility.

82. Norfolk Southern, formerly Norfolk and Western, was a customer of the Portsmouth Facility that sent scrap metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. Norfolk Southern sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances. Norfolk Southern's repair shop was the source of the scrap sent to the Portsmouth Facility.

83. Schlumberger Industries was a Portsmouth customer, although I am not sure of the type of scrap it sent. Schlumberger Industries, with headquarters in Texas, was in the maritime and tugboat business and had a repair shop in the Portsmouth, Virginia area.

84. Seaboard Marine was an old customer of the Portsmouth Facility that sent scrap that may have contained electric motors, piping with lead, parts ripped out of boats, condensers, generators and pumps with hazardous substances.

85. Stanley Hardware was a customer of the Deepwater Facility.

86. Waste Management may have generated scrap (e.g. air conditioners) that it may have sent to the Portsmouth Facility.

87. Brenco was a customer of the Deepwater Facility.

88. Woodington Electric was a customer of the Portsmouth Facility.

89. Capital City Iron Works was a fabrication business. I am unsure whether it was a Deepwater Facility or Portsmouth Facility account.

90. Cardwell Machine was a customer of the Deepwater Facility.
91. E.R. Carpenter was a customer of the Deepwater Facility.
92. NAITO America, a Japanese company, was a supplier of scrap to the Portsmouth Facility.
93. Tyson Foods was a customer of the Portsmouth Facility. I believe that the scrap it sent to the Portsmouth Facility included electric motors that may have had PCBs, cutting machine oils, and lubricants.
94. Keyser at Montvale was an auto hauler located in Roanoke that was a customer of the Deepwater Facility.
95. Cleveland Wrecking was a demolition company from Cincinnati, Ohio that sent scrap from the USN and other non-military customers to the Portsmouth Facility.
96. Thousands of suppliers that had a relationship with the Portsmouth Facility over a long period of time provided a continual stream of business. One such business was Newport News Shipbuilding and Drydock.
97. The Chesapeake Corporation ("Chesapeake") had a facility in West Point, Virginia. Chesapeake sold scrap to the Portsmouth Facility in the 1960s through the 1980s. During that time period, Chesapeake sent materials such as batteries, solder, galvanized wire, roofing material, and other metals that contained lead, tin, and zinc, lubricants and other substances. During that time period, Chesapeake also sent scrap including transformers to the Portsmouth Facility that may have contained PCBs and other chemicals. Chesapeake sent lead-acid batteries to the Portsmouth Facility during the time period when battery breaking was going on there.
98. Chesapeake's West Point Mill generated scrap that was loaded on trucks from

containers, where scrap materials were collected to be sent to the Portsmouth Facility.

Transformers of different shapes and sizes were thrown in the bins that Chesapeake sent to Peck Portsmouth. I believe that transformers were sent by Chesapeake to Peck Portsmouth when there were electrical upgrades at the West Point mill, and that such transformers could have been older, unserviceable transformers or newer serviceable transformers.

99. Scrap metal sent by Chesapeake to the Portsmouth Facility would have contained lead paint, and would have included metal cleaning solution, lubricants, liquids and grease. Transformers would have contained PCBs, and galvanized corrugated steel from the mill's roof might have included insulation that contained asbestos.

100. Chesapeake sent scrap metal to both the Portsmouth Facility and the Richmond Facility.

101. Any transformers received by Peck Portsmouth, regardless of whether they were serviceable, were processed by Peck Portsmouth in order to recover the scrap metal and were not purchased to be sold to third parties for reuse. Scrapping operations at Peck Portsmouth were labor intensive, and due to its processing practices, it was not cost effective for Peck Portsmouth to pull out any usable parts for reuse or resale. After copper and transformer oil were removed, copper metal was recovered from transformers and the steel was cut to sizes required by the steel mill consumers.

102. Transformers sent to Peck Portsmouth were steel boxes that contained oil with the PCB additive and steel wrapped with copper in different configurations and quantities. Insulation may have been on the copper and glass balls may have been attached. Some of the persons who sent transformers to the Portsmouth Site would have removed the insulation prior to sending them.

103. Transformers sent to the Portsmouth Facility could have been large (more than 100 pounds), but most were small in size (less than 100pounds).

104. The Peck Company regularly received "suspect material" meaning material that may have contained hazardous substances, from various companies, including but not limited to Vepco, Chesapeake, DuPont, the Virginia Highway Department, military bases and shipyards with which the Peck Company did business.

105. Various non-gov't companies and scrap collectors brought to the Portsmouth Facility metal from gov't bases, landfills, farms, manufacturing plants, machine shops, etc The largest dealer was John Holland, whose operation was located in Suffolk, Virginia.

106. Victor Peck, , is my cousin.

107. Victor Peck may have operated Strategic Alloys, which may have done business with the Department of Defense ("DOD"). If it did, any scrap received from DOD would have been sent to the Portsmouth Facility.

108. Peck purchased much scrap from Dupont and Allied Chemical. Other "old" customers whose material might have gone to Portsmouth included: Union Bag Camp (large paper company in Franklin, VA) and Georgia Pacific. Peck in Richmond received (and rejected) railroad tank cars from Allied that contained noxious fumes. Dupont sent Peck's Richmond plant, containers marked, "radioactive." Scrap was usually loaded at the customers' sites in trucks or railroad cars and delivered to Elm Ave in Portsmouth or to Richmond for processing. Most of the sellers had multiple locations from which they would have sold their scrap and it would have been delivered to/received at Elm Ave (e.g. scrap from damage at an accident site; abandoned equipment; obsolete facilities; left over materials from a repair and maintenance shop, etc.). The scrap likely had attachments or components with solvents or lubricants or fuels,

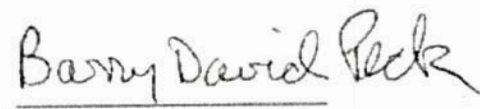
etc., that may have included heavy metals, chemical additives, coatings, etc., that may have been hazardous. When processing the scrap, the contaminated elements would have fallen to the ground. Had Peck been informed or warned of any dangerous properties, it would not have purchased or handled the material.

109. In general, where references are made to "hazardous substances," I did not know at the time whether the substances sent to Peck were in fact actually hazardous or actually had dangerous properties.

110. Had we been informed or warned of the dangerous nature of these substances, The Peck Company would not have purchased or handled those materials or would have handled those materials differently.

NOTE: This Declaration is based on my best recollection, information and belief. This Declaration is based on information gained in my capacity as a principal and officer of The Peck Company and its predecessors and, in certain respects, not necessarily as the result of direct knowledge or involvement. My statements are based on current knowledge and information which may have been unknown to me at the time the events occurred.

I, Barry David Peck, declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of June, 2009.


BARRY DAVID PECK

Ex 11



SDMS DocID 2071071

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May 10, 2006

**VIA ELECTRONIC AND
OVERNIGHT MAIL**

Mr. Randy Sturgeon (3HS23)
United States Environmental
Protection Agency, Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

**Re: Response of The Peck Company to Request for Information Pursuant
Under Section 104(e) of CERCLA With Regard to Peck Iron and Metal
Property, 3850 Elm Avenue, Portsmouth, Virginia**

Dear Mr. Sturgeon:

On behalf of The Peck Company (hereinafter "Peck"), this is the response, as of the date set forth above, to the letter from Dennis P. Carney dated January 13, 2006, and received by Peck on March 6, 2006, requesting information with regard to the Peck Iron and Metal property in Portsmouth, Virginia (hereinafter the "Information Request").¹ We are submitting this response in our capacity as counsel for Peck. Peck understands that it has a continuing obligation to supplement this response if additional information becomes available, and Peck reserves the right to submit additional information that it may find to be responsive to the Information Request.

Set forth below are each question contained in the Information Request in *bold-faced, italicized type*, followed by Peck's response as of the date of this letter.

¹ The Information Request called for a response within 30 calendar days of the date on which we received it. In a letter to Dennis Carney sent on March 17, 2006, David Peck requested an extension until May 5, 2006, to submit Peck's response. On behalf of EPA, Mr. Carney granted this request in a letter sent to Mr. Peck on March 28, 2006. Patricia Miller granted Peck an additional extension until May 10, 2006, which I confirmed in an e-mail to Ms. Miller on May 3, 2006.

Mr. Randy Sturgeon
May 10, 2006
Page 2

1. *As it relates to the Site, what is the current nature of your business or activity or any other business or activity that may be taking place at the Site?*

RESPONSE:

Currently a minority owned business, Able Body Demolition, is using the property to store its trucks. Able Body also has unloaded inert material, including concrete, dirt, and asphalt, on the property, and has spread some of the piles of asphalt and concrete. The company has followed Peck's instructions not to remove any soil from the site, and to keep any visitors or vandals off the site.

2. *As it relates to the Site, what was the nature of any business or activity during the period of time you or any member of the Peck family, or a company substantially owned or controlled by the Peck family, either owned and/or operated the Site?*

RESPONSE:

From 1945 to approximately 1990, the business conducted at the property was the purchase, processing, storage and shipping of metal scrap from various military bases, other federal, state and local government agencies, and local businesses. Liquidation of remaining scrap materials off of the property continued into the early 1990s. In addition, Peck Equipment Company was established in the 1960's to locate hard-to-find parts for the U.S. Navy.

In a letter from S.G. Werner to D.S. Welch of EPA dated May 11, 2004, Mr. Werner provided an historical summary of Peck's activities at the property. This letter also was provided as an attachment to an e-mail from S.G. Werner to K. Bunker dated July 28, 2004.

3. *Describe how the size or property boundaries of the Site have changed since the inception of Peck activities at the Site.*

RESPONSE:

Some time during the period between 1945 and 1950, Peck acquired land adjacent to the original parcel. In the 1990's, less than an acre was acquired from the U.S. Navy. In 2003, Peck donated a conservation easement of approximately six acres along Paradise Creek to the Elizabeth River Project ("ERP"), which modified the land to serve as a wetland and forested buffer area. In the course of its work, the ERP removed a berm, dredged soils, re-contoured the area, and deposited soil back on other portions of the Peck property.



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The current 33 acres are on five parcels. The following table summarizes the title history of the current property.

Deed Records Search

DATE	GRANTOR	GRANTEE	COMMENTS
05-18-88	Peck Iron & Metal Co., Inc.	Elm Leasing Co.	2.990 ac - 1 st part 2 nd & 3 rd parts - Easements
10-01-76	USA Dept. of Navy	Peck Iron & Metal Co., Inc., et al.	3 rd part - Easement, 0.05 ac.
06-30-76	Norfolk- Portsmouth Belt Line Railroad Co.	Peck Iron & Metal Co., Inc., et al.	2 nd part - Easement agreement for use of Scott Center Road Crossing
10-28-69	USA Dept. of Navy	Norfolk-Portsmouth Belt Line Railroad Co.	Deed of Easement
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
05-13-88	Peck Iron & Metal Co., Inc.	Peck Portsmouth Land Co.	Parcel B - 22.924 ac.
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
01-26-60	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	21.4 ac.
01-26-60	Peck Iron & Metal Co., Inc.	Kenneth McCracken, Trustee	Holder of Note, 21.4 ac.
03-31-31	Portsmouth Cotton Oil Refining Corp.	Proctor & Gamble	Parcels A & B - 110 ac.
01-01-88	Julius S. & Bess P. Peck	JSP Land Company	2 ac; Parcel A-1.174 ac.; Parcel B- 2.733 ac.; 1st-0.8016 ac.; 2 nd -1 ac.; 3 rd - 0.55 ac.; 4 th -Parcel 1-0.004 ac., Parcel 2-0.17 ac.
07-29-47	Trites Refinery, Inc.	Julius S. Peck	2 ac.
07-12-47	Philip C. Cuddeback, et ux.	Trites Rendering, Inc.	

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03-08-47	Frederick W. Marrat	Philip C. Cuddeback	
01-07-29	American Forest Products Company	Frederick W. Marrat	
10-11-28	Cradock Mfg. Co.	American Forest Products Company	
09-29-50	Richard B. Kellam, Special Commissioner, et al.	Julius S. Peck & R.F. & Thirza Trant	Parcels A (1.174 ac.) & B (2.733 ac.). Kellam Commissioner for dispute in Trant family. R.F. paid off dispute amount to Commissioner, land released to Peck
07-30-28	H.W. West	John H. Trant, Jr.	
07-05-28	R.D. White	John H. Trant, Jr.	
05-28-28	Cradock Mfg. Co.	Richard B. Kellam, Special Commissioner	
08-06-45	Joseph W. Dunkam, et al.	Julius S. Peck (formerly Julius S. Pecker)	1 st - 2.304 ac. 2 nd - 1 ac. 3 rd - 0.55 ac. 4 th - Parcel 1 - 0.004 ac. Parcel 2 - 0.17 ac.
06-29-44	Commonwealth of Va.	Joseph W. Dunkum	4 th - Parcels 1 & 2; quit claimed to Dunkum
05-31-43	County of Norfolk	Commonwealth of Va.	4 th - Parcels 1 & 2; quit claimed to Commonwealth of Va.
08-03-28	Norfolk Portsmouth Bridge Corp.	County of Norfolk	4 th - Parcels 1 & 2
04-18-28	Cradock Mfg. Co.	Joseph W. Dunkum	3 rd - 0.55 ac.
04-16-27	Cradock Mfg. Co.	Joseph W. Dunkum	1 st - 2.304 ac.
04-27-26	Cradock Mfg. Co.	Joseph W. Dunkum	2 nd - 1 ac.

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4. *Explain how hazardous substances such as, but not limited to, polychlorinated biphenyls (PCBs) and lead came to be present on the site.*

RESPONSE:

The metal scrap purchased during the period of scrap metal operations consisted of damaged and obsolete equipment, attachments, parts, and other miscellaneous materials. At various times the scrap contained cadmium-coated automobile parts; lead as an additive in petroleum products; PCBs in insulated wire, gaskets, fluorescent lights, transformer oil, and household appliances that used capacitors; lead-based paint in scrapped bridge sections; and lead in automobile batteries. Metal scrap from the government was not cleaned or purged of hazardous substances before transfer to the Peck property.

5. *Provide all information regarding the current or past environmental and physical conditions at the Site including but not limited to geology and hydro-geology, soil, groundwater, surface-water (including drainage patterns), sediments, sewer systems, and storm water conveyance systems. This includes, but is not limited to, field observations and measurements, laboratory data, field screening data, boring logs, sample locations and dates.*

RESPONSE:

Physical and chemical data for the property have been submitted to the Virginia Department of Environmental Quality ("DEQ") and EPA. Peck believes that information provided to DEQ and EPA through December 2004 confirmed that there are discrete locations on the property with elevated concentrations of certain parameters, but that there would be no unacceptable risk to the environment or to humans if the property were covered with a cap and restricted as to future use. Furthermore, there were no indications that the property would endanger anyone if left undisturbed. A risk assessment prepared for Peck indicates that there would be no unacceptable risks to humans or the environment or the likelihood of a release to groundwater even if it were assumed that there are PCB concentrations of up to 5,000 mg/kg in the former metal processing area.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

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Date	Recipient	Sender	Description
15-May-03	Bernard, J.	Werner, S.G.	Draft Site Characterization Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report, Proposed Pull-A-Part Site, 3500 and 3850 Elm Avenue, Portsmouth, Virginia
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
12-Aug-03			Quantitation Report of samples obtained on 8-Aug-03
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
21-Oct-03	Werner, S.G.	Unze, S.C.	Attaches sample results for PCDDs and PCDFs
04-Nov-03		Williams, M.D.	Pull-A-Part Sampling Event: 08-06-03
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
21-Nov-03	Werner, S.G.	Kinder, D.S.	Explanation of deficiencies cited in M. Williams 4-Nov-03 report
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum
17-Feb-04	Werner, S.G.	Williams, M.D.	Memorandum regarding QA/AC criteria

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Date	Recipient	Sender	Description
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden; and a response by laboratory to deficiencies identified by Draper Aden
30-Mar-04	Rice, S.	Werner, S.G.	Letter enclosing PCB analytical data, including map showing October 2003 PCB soil sampling results
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Property Access Agreement attached
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
07-Jul-04			Sediments chain of custody form prepared by Mr. Hatcher
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan

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Date	Recipient	Sender	Description
20-Jul-04		Severn Trent Labs	Sample confirmation report
16-Aug-04	Hatcher, R.F.	Jarvela, S.	Email regarding preliminary results of 7-Jul-04 sampling event
03-Sep-04	Hatcher, R.F.	Rieger, J.	Summary of samples taken; cost of analysis; map of locations where samples were taken
28-Sep-04	Loeb, M.	Werner, S.G.	Email update on sample analysis
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 correspondence regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
18-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Email setting out treatability study results and suggesting a meeting to discuss the results, treatment/stabilization strategies, regulatory implications and costs.
23-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Additional treatability results
06-Jan-05	Hatcher, R.F., Bernard, J.F., Green, K.L.	Rieger, J.	Email regarding 70 ppb PCB screening level in sediments
03-Feb-05	Hatcher, R.F.	Williams, T.G.	Fax proposing use of same grid numbers and letters system as drawing supplied to Koontz-Bryant, reporting of plant to conduct site work from 8-Feb-05 thru 10-Feb-05
09-Feb-05	Bernard, J.	Werner, S.G.	Memorandum regarding soil sample location plan
16-Jun-05	Werner, S.G. & Hatcher, R.F.	Webb, J.N.	Requesting status of grid sampling effort



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Date	Recipient	Sender	Description
Undated			Site location map; well locations and boring locations; summary of analytical data - surface soil samples (6/1999 & 7/1999); summary of analytical data - soil/water interface soil samples (7/1999); summary of analytical data - groundwater (7/1999); summary of analytical data - mixed media (7/1999)

Peck is submitting to EPA with this response the laboratory data reports for samples collected at the property during 2005.

6. *Provide all documents that show the types of material accepted, customers, operational periods, and description of operations (including locations of operations) both owned and/or operated by you or any tenant(s).*

RESPONSE:

Peck has no documents in its possession responsive to this question. The following provides a brief description of operations on the property based on David Peck's recollection.

The operations at the property until the 1980's were located in and around the cinderblock buildings in the center of the property. At one of the buildings, a hydraulic guillotine shear cut steel to size. One building served as a sorting and storage room for non-ferrous metals and contained a small aluminum furnace to melt aluminum scrap. In the front, by the stop light, was a men's locker room and machine shop. A weigh scale was outside an office trailer near the stop light.

During the period of scrap metal operations on the property, the Department of Defense processed and sold metal scrap to Peck Iron & Metal from various military bases and Navy yards, including: Norfolk Naval Shipyard; Naval Air Station; Oceana; St. Juliens Creek; Cheatham Annex; Yorktown; Quantico; Ft. Meade; and Bellwood. The General Services Administration, Coast Guard, NOAA, and other agencies of the federal government also regularly sold surplus material to Peck Iron & Metal. Other large, non-government sellers to Peck Iron & Metal included the railroads, Virginia Electric and Power, landfills (which were

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sources of white goods and miscellaneous scrap), and the ship repair facilities, including Newport News Shipbuilding and Drydock, Norfolk Shipbuilding, and Moon Engineering.

Two occupants of the property -- neither affiliated with Peck -- in approximately 2001-02 operated businesses involving the handling of equipment and perhaps scrap metals. One occupant's operation led to action by DEQ, after which Peck evicted the occupant from the property. Currently, Able Body Demolition is using the property for truck storage and is helping to keep the property secure.

7. *Provide any correspondence to or from local, state or federal governments that discuss environmental conditions or issues at the property. This could include, but is not limited to, information regarding inspections, permits, violations and discharges.*

RESPONSE:

At the time Peck entered the Virginia Voluntary Remediation Program, its past and current environmental data were provided to DEQ. The history was also carefully reviewed by the Elizabeth River Project before it accepted approximately seven acres for a conservation easement.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

Date	Recipient	Sender	Description
30-Apr-02	Gussman	Mayfield, M.	Letter informing DEQ of grant to address stormwater and habitat enhancement at Peck site
01-May-02	Peck, B.D.	Jackson, M.M.	Letter recommending demonstration project to enhance shoreline/stormwater on western side of Peck project, indicating that ERP expected \$30,000 to \$40,000 in grant funds to be available to assist in this voluntary project

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Date	Recipient	Sender	Description
06-Nov-02	Various	Jackson, L.	Email requesting comments on attached "Project Activities Coordination Meeting for 'Return to Paradise' - Peck Iron & Metal, Timeline of Action Items." List of attendees also attached.
27-Nov-02	West, T.	Pocta, M.A.	Letter regarding Joint Permit Applications (Peck and Elizabeth River Project) for wetlands restoration project and a stormwater/wetland pond
02-Dec-02		U.S. Army Corps of Engineers	Notification that Peck's proposed activity may qualify for Nationwide Permit 39; that proposed activity may affect historical properties (Norfolk Naval Shipyard); therefore, work cannot commence until requirements of National Historic Preservation Act have been met
06-Dec-02	Greene, K.L.	Cohen, A.	VRP Application for property located at 3850 Elm Avenue
13-Dec-02	Levetan, S.L.	Mayfield, M.	Letter offering grant-funded assistance to implement ERP's recommendations for sustainable development of Peck Site. Attached is "Environmental Stewardship Recommendations, Proposed Pull-a-Part Auto Recycling Facility, Elm Avenue, Portsmouth, VA" and "Best Management Practices for the Auto Salvage Industry"

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Date	Recipient	Sender	Description
06-Jan-03		VIMS	VIMS Shoreline Permit Application Report 02-2315 recommending applicant submit formal planting and monitoring plan
09-Jan-03			Notice of Public Hearing, Wetlands Board of the City of Portsmouth - Request of The Peck Company and The Elizabeth River Project for a wetland restoration area on the property at 3850 Elm Avenue
06-Mar-03			Portsmouth City Council, Public Hearing/Planning Items. Resolution (signed by City Manager) approving with conditions Pull-A-Part of Portsmouth's proposal to operate a motor vehicle recycling facility at 3850 Elm Avenue
11-Mar-03			Portsmouth City Council, Agenda. Pull-A-Part's use permit application is on agenda
14-Mar-03	Porter, S.J.	Wetmore, D.G.	Letter stating the exception request for BMP should not be granted because it does not meet necessary requirements
02-Apr-03	Pocta, M.A.	Porter, S.J.	Letter requesting additional WQIA information for site be submitted to Department by 11-Apr-03
10-Apr-03	Haste, G.J.	Pocta, M.A.	CBLAD and City of Portsmouth need stormwater calculations and justification for the stormwater location in the RPA buffer

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Date	Recipient	Sender	Description
11-Apr-03	Hatcher, R. F.	Hannah, J.	"Benefits of Proposed Stormwater Wetland at Peck Iron & Metal Site," Bill Hunt, Advisor to the Elizabeth River Project
14-Apr-03	Porter, S.J.	Hatcher, R.F.	Letter responding to 2-Apr-03 letter to M.A. Pocta in connection with locating a BMP within the Resource Protection Area for Paradise Creek wetlands
22-Apr-03	Porter, S.J.	Pocta, M.A.	Letter withdrawing Application for Exception from consideration at the City's Planning Commission meeting on 6-May-03
22-Apr-03	Hatcher, R.F.	Porter, S.J.	Memorandum stating information the City was seeking on stormwater calculations and buffer was not submitted timely and therefore will not be considered at the Planning Commission's 6-May-03 meeting
15-May-03	Bernard, J.	Werner, S.G.	DRAFT Site Characterization - Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report. Attached are: results of 29-Jul-99 Hatcher-Sayre Site Characterization Study; REAMS Risk Analysis; groundwater analytical results for 5-03 sampling; 9-Jul-99 Final Scope of Work for Site Investigation at The Peck Company, Portsmouth, Virginia
18-Jun-03	Hatcher, R. F.	Bernard, J.F.	Comments from DEQ and EPA on 28-May-03 Site Characterization Report and 4-June-03 site visit

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Date	Recipient	Sender	Description
18-Jun-03	Hatcher, R.F.	Bernard, J.F.	Letter commenting on 28-May-03 Site Characterization Report and 4-Jun-03 site visit
23-Jun-03	Hatcher, R.F.	Dinardo, Nicholas	Email requesting site visit with representatives of EPA, DEQ, and Peck.
14-Jul-03	Bernard, J.F.	Hatcher, R.F.	Letter regarding 9-Jul-03 meeting with DEQ and EPA, Peck's and Pull-A-Part's commitment to locate, remove and remediate "hot spots"
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
15-Sep-03	Comacho, J.	Werner, S.G.	Email inquiry regarding dioxins in soil -- capping as remediation
15-Sep-03	Cooper, D.	Werner, S.G.	Email listing questions regarding dioxin Werner would like to discuss with Cooper in a 1:30 telephone conversation
22-Sep-03	Rupert, R.	Jackson, M.M.	Memorandum setting out the Elizabeth River Project's position on disputed issues concerning contamination at the Peck site
25-Sep-03	Levetan, S.L.	Bernard, J.F.	Comments from DEQ and EPA on 4-Aug-03 Response to Comments and Proposed Sampling Plan

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Date	Recipient	Sender	Description
09-Oct-03			Agenda for 9-Oct-03 Elizabeth River Project meeting
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum -- describes sampling activities between Jun- and Nov-03, analytical testing results and proposed approach to site remediation; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum, stormwater runoff and the buffer
30-Dec-03	Hatcher, R. F.	Levetan, S.L.	Email forwarding language regarding "Peck 20031211 Review Ltr 1" providing EPA comments and observations of the 7-Nov-03 Peck Site Characterization Report
09-Jan-04	Hatcher, R.F.	Mayfield, M	Email entitled, "Elizabeth River Partnership - Jeopardy?" in which Mayfield forwards an exchange with Don Welsh, EPA Regional Administrator
15-Jan-04	Bernard, J.	Jarvela, S.	EPA's comments on Site Characterization Report
23-Jan-04	Bernard, J.F.	Greene, K.L., et al.	Email forwarding comments and observations on the 7-Nov-03 Peck Site Characterization Report

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Date	Recipient	Sender	Description
06-Feb-04	Bernard, J.F.	Hatcher, R.F.	Email forwarding Bernard's comments to K. Greene regarding EPA's comments and concerns: QA/QC documentation and the vertical investigation area
06-Feb-04	Peck, B.D.	West, T.L., MRC	Acknowledging receipt of application seeking authorization to create wetlands and clear phragmites
13-Feb-04	Bernard, J.F.	Jarvela, S., et al.	Series of emails whereby State requests contact from EPA for Perspective Purchaser Agreement issue; EPA requests point of contact for Pull-A-Part
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden and a response by laboratory to deficiencies identified by Draper Aden
27-Feb-04	Gills, W.	Werner, S.G.	Brownfield Remediation Loan Application submitted on behalf of The Peck Company
09-Mar-04	Jarvela, S.	Bernard, J.F.	Letter stating EPA is satisfied with Draper Aden site characterization and determined the project can proceed to the remediation stage
11-Mar-04	Bernard, J.	Jarvela, S.	Letter stating EPA's position that DEQ is the lead agency for Peck site project and is committed to support DEQ as the remedial action plan proceeds

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Date	Recipient	Sender	Description
12-Mar-04	Hatcher, R. F.	Bernard, J.F	Email colloquy at DEQ regarding Peck's Brownfield's loan application
26-Mar-04	Peck, B.D.	Gills, W.A.	Letter notifying Peck the SWCB approved Brownfield Remediation loan in the amount of \$960,000 contingent upon satisfactory credit analysis by the VRA.
16-Apr-04	Bunker, K.	Bernard, J.F.	Email regarding Bunker's assignment as EPA's project manager of the Peck site
22-Apr-04	Bernard, J.	Bunker, K.	Email requesting DEQ to instruct Peck to submit a self-implementing PCB cleanup plan that complies with 40 CFR 761.61(a)
07-May-04			One page synopsis of Peck Recycling Co.'s history
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
18-May-04	Hatcher, R.F.	Jarvela, S.	Email stating Jarvela hasn't scheduled trip, but will send access form for owner to sign
15-Jun-04	Werner, S.G.	Bernard, J.F.	Email responding to S. Werner's interpretation of 40 CFR section 761.61 in connection with the Self-Implementing PCB Cleanup Plan. Email also discusses wetlands sampling
16-Jun-04	Baldwin, Bob	Jackson, L.	Email requesting a meeting with Baldwin and/or other City of Portsmouth representatives to discuss the City's concerns or needs in order to move forward with Elm Avenue remediation

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Date	Recipient	Sender	Description
22-Jun-04	Peck, B.D.	Burke, J.J.	EPA's comments on Peck's Notification and Certification, dated 11-May-04, provided pursuant to requirements of the Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste Regulation
27-Jun-04	Peck, B.D.	Jarvela, S.	Fax cover sheet attaching access agreement; Jarvela will contact Hatcher to schedule site visit
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Also attaches Property Access Agreement
29-Jun-04			DRAFT "Sampling and Analysis Plan for the Peck Iron and Metal Site, Portsmouth, Virginia" prepared for EPA by Tetra Tech
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan

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Date	Recipient	Sender	Description
28-Jul-04	Bunker, K.	Peck, B.D.	Memorandum regarding Peck's former operations at Portsmouth site.
28-Jul-04	Bunker, K.	Werner, S.G.	Email attaching a historical summary of Peck's activities at Elm Avenue which were included in 11-May-04 cover letter to Self-Implementing Cleanup Plan
28-Jul-04	List	Bunker, K., EPA	Email giving status on cleanup plan -- still reviewing amended plan EPA received on 14-Jul-04
16-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email stating Levetan indicates Pull-A-Part is very determined to purchase property
20-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email regarding status of Elm Avenue VRP project
23-Aug-04	Ward, K.	Bernard, J.F.	Email stating Elm Avenue project is moving forward
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 communication regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
16-Nov-04	Baldwin, R.A.	Barclay, R.C.	Letter Application for Extension of Use Permit 03-01 by Pull-a-Part of Portsmouth, LLC to operate a motor vehicle recycling facility at 3850 Elm Avenue, owned by The Peck Company, Peck-Portsmouth Recycling Co.
19-Nov-04	Peck, B.D.	Burke, J.J	EPA's response to Peck's Revised Notification and Certification, dated 25-Oct-04

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Date	Recipient	Sender	Description
01-Dec-04			Chronology of Primary Activities - Proposed Pull-A-Part, Inc. Site - Elm Avenue, Portsmouth, VA
22-Dec-04	Hatcher, R.F.	EPA, DEQ	Confirming 5-Jan-05 meeting to discuss options available under TSCA and/or CERCLA to move forward on remediation of the Peck site
05-Jan-05			Attendance list of meeting
05-Jan-05			Draper Aden, "The Case for Self-Implementing Site Remediation, Peck Property, Portsmouth, VA," presentation to EPA
20-Jan-05	Peck, B.D.	Webb, J.	Letter proposing that Peck amend its 22-Oct-04 self-implementing cleanup plan to include certain conditions and sampling plans
26-Jan-05	Welsh, D.S.	Werner, S.G.	Letter addressing conditions set out in EPA's 20-Jan-05 letter for self-implementing cleanup plan
01-Feb-05	Peck, B.D.	Webb, J.	Letter approving 22-Oct-04 self-implementing cleanup, subject to conditions set out in EPA's 20-Jan-05 letter
23-Feb-05	Ward, K.	Bernard, J.F.	Email colloquy regarding EPA approval of project; inquiry regarding interest rate for Peck's loan
28-Jun-05	Webb, J.N.	Peck, B.D.	Letter notifying EPA, et al. that Peck is going to stop conducting the PCB cleanup plan
15-Oct-05	Peck, B.D.	Burke, J.J.	EPA's response to Peck's Revised Notification and Certification, dated 13-Jul-04

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Date	Recipient	Sender	Description
07-Dec-05	Sturgeon, R., EPA	Peck, B.D.	Memorandum setting out reasons for withdrawing self-implementing cleanup plan, conclusions of risk assessment, and proposed "closure" plan
08-Dec-05	Peck, B.D. & Gant, Rene	Sturgeon, R.	Response to Peck's Dec-05 letter

8. *Provide information regarding modifications made to the property, including, but not limited to, areas of fill, areas where the topography was modified, areas of burial and/or dumping, and areas of construction and/or demolition.*

RESPONSE:

Peck demolished a building at the entrance to the property at 3500 Elm Avenue in response to a demand by the N&P Beltline. In addition, part of the former Proctor & Gamble masonry building near that entrance was demolished within the last ten years.

Inert material was dumped on the site by various contractors during the past ten years. If trash or suspect material was found, contractors were employed to remove the material for disposal at a landfill. Able Body Demolition spread inert concrete, asphalt, and soil on the property during the past few months. Any suspect soil or other material was to be placed in the area of the buildings where scrap metal processing operations once occurred.

Please also see the response to question 3 above.

9. *Provide all information on the current and recent use of the Site including actions such as, but not limited to, the storage of soils, material or equipment, or modification or movement of soils or sediments located on the Site.*

RESPONSE:

Please see the answer to question 8 above. In addition, during 2005, Able Body Demolition excavated certain areas of soil, moved the materials to the former operations area, and subsequently covered the area with inert materials. Able Body personnel were warned of the

Mr. Randy Sturgeon
May 10, 2006
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nature and potential danger of the excavated soil and were instructed about where on the property the soil should be placed.

10. *Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons that worked at the Site for longer than three years.*

RESPONSE:

Stanley Peck and Aaron Peck worked at the property for a period of time until the early 1990s. Their current addresses and phone numbers are:

Stanley J. Peck

[REDACTED]
[REDACTED]
[REDACTED]
(714) 622-XXXX

Aaron M. Peck

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Personnel records from the period of active site operations were not retained.

11. *If you have any information about other persons/entities who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the person's entity's name, address, type of business, and the reason(s) why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.*

RESPONSE:

Peck has no additional information responsive to this question.

**HUNTON &
WILLIAMS**

Mr. Randy Sturgeon

May 10, 2006

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Please contact Roger Hatcher or me if you have questions about this response to the Information Request.

Yours truly,



Dan J. Jordanger
Counsel to The Peck Company

Enclosures

cc: Mr. B. David Peck
Roger F. Hatcher, Ph.D.

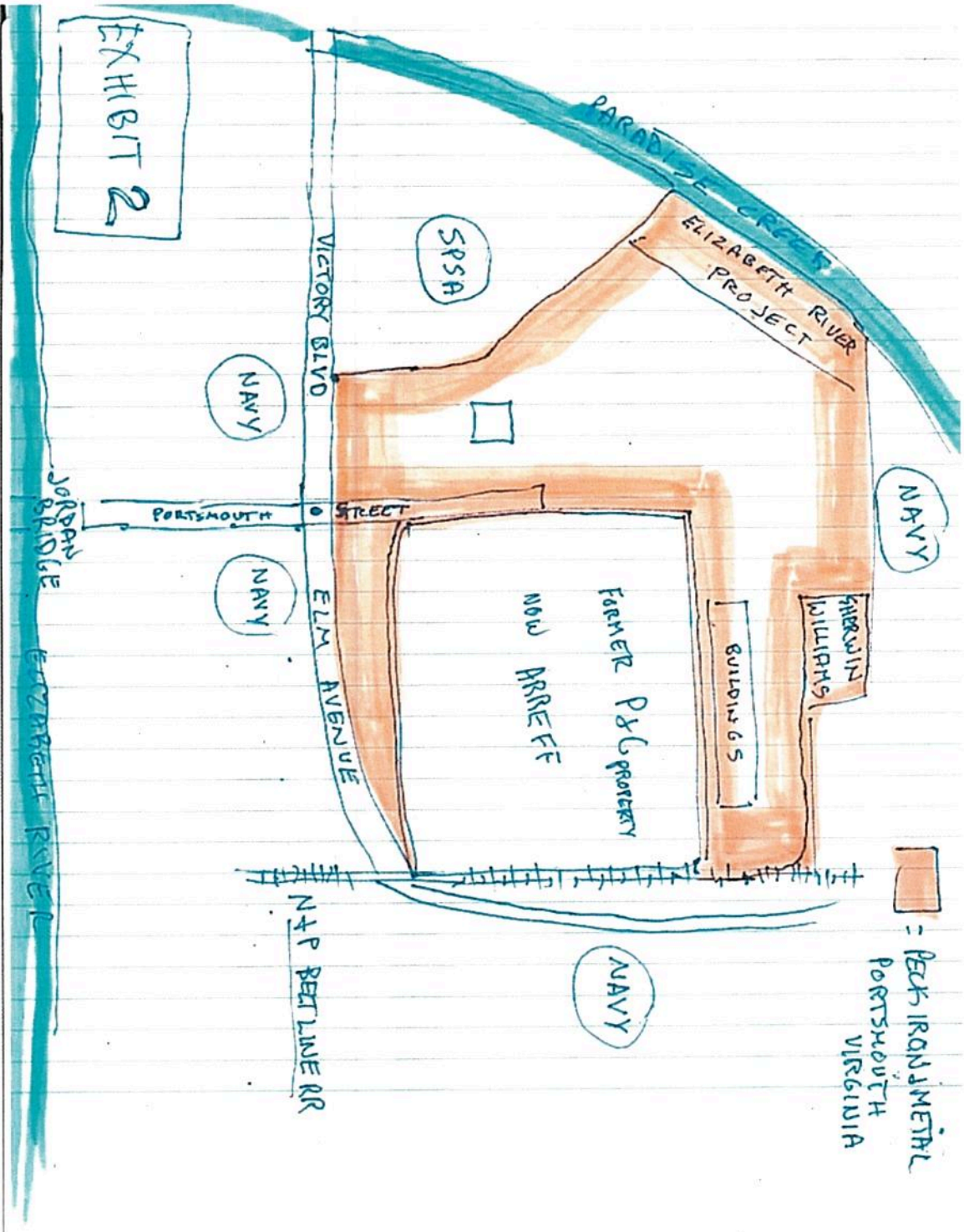


EXHIBIT 2



Draper Aden Associates

Engineering • Surveying • Environmental Services

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E4 3

May 11, 2004

Mr. Donald S. Welsh
Regional Administrator
U.S. EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Self-Implementing PCB Cleanup Plan
34-Acre Site, Elm Avenue
Portsmouth, Virginia
DAA Project # R03186-01

Dear Mr. Welsh:

This Self-Implementing PCB Cleanup Plan is submitted on behalf of The Peck Company, Richmond, Virginia for the above referenced property. This property has been in the Virginia Department of Environmental Quality's Voluntary Remediation Program for more than a year and we are anxious to return this inactive property to productive use. The remaining issue that has stopped progress on this project concerns PCBs and thus, the reason for submitting the attached Plan.

The site meets all of the criteria for the self-implementing procedures and we believe that the Plan addresses all of the requirements of 40 CFR § 761.61. Prior to reviewing the plan, it is important that EPA understand the history of this property, which is summarized below by the owner, The Peck Company.

Peck Recycling Co., Inc. bought, sold, and processed metal scrap for fifty years from different locations. The metal came from industrial plants, farms, auto parts yards, Federal Government (e.g. military bases); State (e.g. Highway Dept.) and Local (e.g. Police Dept.) agencies.

The metal scrap was purchased after several careful inspections. Trained inspectors looked at the material at the sellers' operation, upon arrival, when weighed, when unloaded, when processed, when stored, and when shipped. Upon being unloaded it was visually, if not manually separated into more than 40 different categories.

The material was checked for radioactivity. Rejections were immediate if any hazardous or toxic material or substance were suspected. For example, 150,000 lbs. of material from a military base were rejected when the base could not definitely identify the liquid in the containers; DuPont had to take back 55-gallon drums when Peck was not satisfied with the stenciled markings on the containers; a railroad tank car from Allied Chemical was not accepted when Peck inspectors detected a noxious odor; Philip Morris (e.g. engines with lubricant drippings) material rejected; etc.

Transformers were not accepted from any sellers with the sole exception of a company that processed them. It removed the laminated steel, wires, copper and oil; then it triple rinsed them before delivery.

The Peck Recycling Company's primary concerns were its employees, its customers (the buyers), and its facilities and grounds. Its record is plain to see. None of its hundreds of employees ever reported or complained of handling or being affected by any hazardous or toxic material. Not one of the thousands of consumers ever reported or complained about discovering any substance that might be hazardous or toxic. Every buyer was very carefully looking for PCB, benzene, heavy metals, hydrocarbons, asbestos, and any attachments or substances that might cause problems.

The continuous training of all Peck employees as inspectors and material handlers had clear results. Peck regularly received a rebate of 25% from its insurance carrier for its extraordinary safety record and procedures. Note that every month Peck handled (i.e. received, unloaded, processed, stored, shipped) more than 100 million pounds of metals.

It is also noteworthy that Peck's operations were in five different cities covering more than 120 acres (Eastern Shore, Danville, Woodford, Portsmouth, Richmond). Upon the sale of the Peck operations in 1997, the properties were closely examined. More than \$100,000 was spent in Phase II activities by independent environmental groups. The only PCB discoveries were on less than 1% of the property although 95% of the properties were used in operations. And the 1% area was where material from military bases was processed until 1969.

The property owner, The Peck Company, and the prospective purchaser/developer, Pull-A-Part, Inc. have responded to all of the EPA and DEQ requests and unfortunately, feel that progress has again been delayed. EPA's prompt review and approval of this Plan is greatly appreciated.

Mr. Donald Welsh
U.S EPA - Region III
May 11, 2004
Page 3

Any questions concerning this closure plan should be directed to either Dr. Roger F. Hatcher (804-492-9458) or me (804-261-2937).

Sincerely,
DRAPER ADEN ASSOCIATES

A handwritten signature in black ink, appearing to read "Steve G. Werner".

Stephen G. Werner, P.G.
Director of Environmental Services

Attachment (2)

cc: Dr. Roger F. Hatcher
B. David Peck
James Bernard, DEQ
Steven L. Levetan, Pull-A-Part, Inc.

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September 15, 2008

VIA First Class Mail

Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Banks:

This responds to the Request for Information Pursuant to Section 104 of CERCLA for the Peck Iron and Metal Site in Portsmouth, Virginia issued June 11, 2008 by Laura B. Janson, Chief, Cost Recovery Branch, United States Environmental Protection Agency, Region III, addressed to the Electric Motor & Contracting Company. It was received at Electric Motor & Contracting Company (the "Company") on June 15, 2008. The Company requested and received a 30 day extension of time in which to respond to this request on July 3, and requested and received a second 30 day extension of time on August 15.

We understand that the Site has been defined as the Peck Iron and Metal Site located in Portsmouth, Virginia with the listed address of 3850 Elm Avenue. It is also our understanding that the Site has been used for decades for scrap metal recycling, and that operations ceased at the Site in or around 1997.

The Company has made reasonable inquiry and conducted a diligent search of currently available Company records, as well as interviews of all Company personnel that had responsibility for waste management at the time of the transactions with Peck Iron and Metal Co., Peck Recycling, Julius S. Peck, B. David Peck, or Aaron Peck, or any other related company or Peck family member (collectively "Peck"), as well as personnel who currently manage waste, or are responsible for recordkeeping relating to waste management at the Company. The responses provided pursuant to the Information Request are not intended and should not be construed as an admission of liability by the Company for the release or threatened release of hazardous substances at the Site, or for any removal or response costs or damages attributable to hazardous substances at that Site.

Answers to Numbered Questions in Information Request

The Company's answers and objections to each of the questions below are set out below following the question from the Information Request.

1. List all shipments of scrap materials, including scrap metal, which your company has sent to the site. Include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identity of the person making or receiving the payment.

The Company maintains records relating to deposits from scrap sales back to 2002, and records of invoices back to 1997. Company records indicate that during this period, there were no sales of scrap material to Peck, nor payments received for such material.

In addition, a review of the Company's records relating to universal and hazardous waste generated and shipped off-site by the Company do not reveal any shipments of such waste to the Site. Interviews of Company personnel indicate that the Company's relationship with Peck was limited, and that only a small number of truck loads of scrap metal were sold to Site during the mid 1990's. The driver who hauled material to the Site indicated that his recollection is that a limited number of loads of scrap metal, perhaps less than 10 total loads, were sold to Peck, and consisted primarily of scrap copper.

Records received from EPA indicate that the following materials were sold to Peck by the Company.

Date	Material	Amount (pounds)
1/11/1995	Cooper – Mixed/Dirty/Contaminated	7,080
1/26/1995	Steel	20,180
2/3/1995	Tin & Steel	5,240
2/6/1995	Cooper – Mixed/Dirty/Contaminated	10,120
3/7/1995	Unprepared Steel	14,750
3/14/1995	Contaminated Copper	8,340
4/19/1995	Contaminated Copper	7,680
	Total	73,390
		32.8 Gross Tons

2. For each shipment of scrap materials identified in response to Question 1 above, identify:

- a. the source of the scrap material;**
- b. the prior use of the scrap materials;**
- c. whether the scrap material was a collection of homogenous materials;**
- d. whether the scrap materials was tested for any hazardous substances prior to shipment to Peck Iron and Metal Co.**

a. The sources of scrap materials were from the Company facility located at 3703 Cook Blvd, Chesapeake, Virginia (the "Facility"). The primary business of the Company is refurbishing electric motors.

b. The prior uses included electric motor components, parts and windings.

c. The materials were relatively homogenous in that the scrap metals consisted of primarily of copper, with a limited amount of scrap steel sent to the site. The Facility has historically, and continues to maintain copper in a locked shed or trailer, while other scrap metals are collected in a separate roll-off. The practice of maintaining these metals separately appears to be reflected in the invoices provided by EPA.

d. The Facility has had a long standing practice of inspecting electric motors as they arrive at the Facility, and identifying whether such motors contain asbestos, or lead paint. If a motor is suspected to contain these materials, the Facility contacts its preferred vendor, which samples the motor and conducts any necessary abatement before the Facility begins work on refurbishing the motor. Wastes from such abatement efforts are segregated and disposed of through the Facilities hazardous waste carrier. In addition, oil and other fluids are drained from any equipment prior to refurbishment, and before any motors that cannot be refurbished are sold for recycling. These practices have been in place since at least the 1980's.

3. At the time of the transaction(s) involving scrap materials listed in your response to Question 1(a), what was the intended disposition of the scrap materials at the Site?

The intended disposition of the scrap materials was for use in creating new metal products through recycling.

4. Did a market exist for the scrap metal listed in your response to Question 1, above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g. ISRI, Department of Defense, or wherever your company would find the grade published)

There was a market of the materials as evidenced by payments received by the Company from Peck for such materials; however the Company did not and does not track that market or the trends of that market. The Company did, on occasion, price shop various companies to determine the highest value of copper on the market.

5. What commercial specification grade did the scrap metal listed in your response to Question 1 (a) meet? Identify/ list the commercial specification grades that each scrap metal identified in 1 (a) met.

The Company has typically recycled mild steel. The Company is unaware of the commercial specification grades of the copper sent for recycling, and typically only grades copper as "dirty" or "clean." These specifications refer to whether or not the insulation has been removed from copper wire.

6. After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to Question 1 (a) was to be made available for use as a feedstock for the manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated

It was the understanding of the Company that all scrap metal sold for recycling was for use as feedstock for new saleable products.

7. Could the Scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

It was and is the Company's understanding that some portion of the scrap metal sold for recycling could have been used as a replacement or substitute for virgin raw materials. However, the Company does not track the details of the scrap metal market with regards to the precise uses for these materials.

8. Could any products to be made from the scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a product made, in whole or in part from a virgin raw material? If so, provide details.

The Company believes that some portion of the products ultimately made from the scrap metals were used as a replacement or substitute for products made, in whole or in part, from virgin materials. However, as stated above, the Company does not track the market for recycled scrap metals, nor the products made from this material.

9. Did your company process any of the scrap materials sent to Peck Iron and Metal Co. prior to transport and delivery to the Site? If yes, describe the process used and the purpose for subjecting the scrap materials to the process.

The Company did not process the metals prior to sale to Peck, other than those abatement processes discussed in the response to Question 2, above. In order to dismantle electric motors prior to refurbishment, the Company regularly will "burn-out" the motor. This involves heating the motor in an oven in order to remove the insulation from the various components, and in particular from the copper windings. This process does not, however, alter the composition of the scrap metal ultimately sent for recycling.

10. Was the transaction between your company and Peck Iron and Metal Co. : 1) an outright sale? 2) the subject of a written or verbal "tolling" agreement between the companies; or a 3) the "banking" of the transacted materials in a metal account at the request of your company for return or other disposition at a later date.

The transactions between the Company and Peck appear to be outright sale of scrap metals, as evidenced by the limited settlement statements. To the Company's knowledge, no records exist showing any agreement between the Company and Peck, and Company personnel do not recall such an agreement. Scrap metal recycling at the facility continues to be conducted either as "hand-shake" deals or spot sales. To the Company's knowledge, no transacted materials sold to Peck were ever returned to the Company.

11. Did your company have a basis for believing that the scrap materials listed in your response to Question 1(a) would be recycled? If not, what was that basis? Provide supporting documentation.

Interviews with Company personnel indicate that the Company's understanding was that the scrap metal sold to Peck was to be recycled. As Peck paid the Company for the materials, this was evidence that the materials had some residual value, and would not simply be sent for disposal.

12. Describe all efforts (i.e. site visits) taken by your company to determine what would be done with the scrap materials identified in your response to Question 1(a) that may have been sold, transferred or delivered to Peck Iron and Metal Co. at the Site.

Interviews with Company personnel and a review of all available records did not disclose the efforts taken by the Company with regards to Question 12.

13. What steps (e.g. internal procedures, Federal, state and local compliance inquiries) were taken by your company to ensure that Peck Iron and Metal Co. the recipient of the scrap materials listed in your response to Question 1 (a), was in compliance with applicable Federal environmental regulations or standards and any amendments, with respect to the scrap materials it received from your company?

The Company does not have any records indicating what efforts may have been conducted relating to ensuring that Peck was in compliance with applicable environmental regulations or standards, nor do Company personnel recall any such efforts. However, scrap metal sold for recycling has not historically been regulated.

14. Did your company have any basis for believing that the Peck Iron and Metal Co. facility at the Site was in compliance with substantive provisions of any Federal, state or local environmental laws or regulations, or compliance order or decree applicable to the handling, processing, reclaiming, storage or other management activities associated with the scrap materials listed in your response to Question 1(a)? If so, identify that basis and provide supporting documentation.

The Company does not have any records relating to the Site's compliance status. As scrap metal sold for recycling has not historically been regulated, the Company would not expect to locate records of having investigated any recycling facility's compliance with environmental laws.

15. Describe the efforts your company undertook with respect to the management and handling of the scrap materials listed in your response to Question 1 (a), including the extent to which you complied with customary industrial practices current at the time of the transaction designed to minimize contamination of the scrap materials by hazardous substances.

The Company utilized and continues to utilize daily visual examination procedures to ensure that materials being sold for recycling do not contain hazardous substances. As noted above, Company procedures ensure that motors are examined, and if necessary abatement of asbestos and lead paint is conducted, prior to the conduct of any refurbishment work that might result in the generation of scrap metal. Asbestos and lead paint wastes are and were managed in separate areas of the Facility from those utilized for scrap recycling, and these materials are handled almost exclusively by the Company's abatement contractor. In addition, all fluids are drained from the motors prior to work commencing, and waste oil is handled in a physically separate area of the Facility.

16. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management or other activities associated with the scrap materials listed in your response to Question 1(a).

The Company does not possess documentation of storage, transport, management or other activities associated with the scrap materials sold to Peck other than those provided by EPA. This is due to the fact that the accounting records relating to the handling of recyclable materials only date back to 2002, and the Company's accounting system indicates that the last transactions with Peck occurred in 1995. However, interviews of Company personnel indicate that asbestos and lead paint in the motors was abated and handled in accordance with applicable environmental and safety regulations and standards prior to any scrap metals being sold to Peck.

17. Identify the person(s) answering these questions and requests for copies of documentation on behalf of your company.

The Company specifically objects to EPA communicating directly with its current employees. Should EPA have interest in further inquiry of current employees, its counsel should communicate with the Company's undersigned counsel.

Without waiving its objections, the Company provides the following list of individuals currently employed with the Company who are known to have or have had some role, or may have had some role, in the management of scrap metals.

Lloyd Spivey, Fleet Manager for the Company since 1990, is primarily responsible for scrap metal recycling at the Facility. Robert Stevens, Maintenance Supervisor for the Company since 1996, is generally responsible for waste management at the Facility. In addition, the Company endeavored to interview all current employees who worked at the plant for the period of 1980 to the present who may have information relating to the requests. In addition to the individuals noted above, the following Company personnel, with their positions at the Company noted, were interviewed with regards to these questions and requests:

Elizabeth Burton – Controller
Larry Aughtman – Assistant Foreman
Donald Lloyd Mabry – Truck Driver
Jimmy Lee King – Chief Executive Officer

18. For each Request, identify all persons consulted in the preparation of the answer

See list above

19. For each Request, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Request and provide true and accurate copies of all such documents.

The Company has reviewed hard copy and electronic records maintained by the Company. Searches have been conducted seeking any documentation or associations with Peck. The Company's accounting system identifies transactions with Peck Iron and Metal Co. These records indicate that the last invoice was sent to Peck on June 24, 1996, with payment made on August 19, 1996. However, it is unclear if this invoice relates to a sale of scrap metal to Peck, or instead relates to services provided to Peck, as discussed in the response to Question 20, below. Further, accounting records indicate that Peck invoiced the Company last on August 30, 1996, with payment made on September 12, 1996. See the response to Question 20 below for an explanation of why Peck had occasion to invoice the Company. Unfortunately, the accounting system only contains these dates, and not further details regarding these transactions. No hard copy files exist with regards to transactions with any of the Peck entities. The information provided in this response is based on recollections by personnel employed at this Facility at the time of the transactions with Peck, as well as the documents provided by EPA.

20. Describe in detail any agreement/ contract your company has had with Peck Iron and Metal Company. In addition, identify any other company operating at the Site and describe in detail any arrangements your company has had with each such company, if any, including the time period of your company's involvement with such company.

Based on the recollections of the Assistant Foreman, the Company provided services to Peck, primarily the repair of electric motors for equipment at the Site, such as the cranes and crushers. In addition, the Company purchased some government surplus motors from Peck, known as 'vent sets,' which are part of the air exchange system on navy ships. They may have also purchased some DC motors from Peck. As a 'quid pro quo' for these transactions, the Company would sell an occasional load of scrap metal to Peck, instead of using their normal scrap metal dealer during this time period, Jacobson Metal. Based on the recollections of the Maintenance Supervisor, the Facility did not enter into contracts with Peck, and the transactions were primarily spot sales of scrap metals. The Company is not aware of any other company operating at the Site.

21. Provide all business records pertaining to your company and Peck Iron and Metal Co. or any other company operating at the Site, including:

- a. Copies of correspondence to and from these companies, including letters and memoranda (both internal and external);**
- b. Copies of invoices, manifests, bills-of-lading, purchasing orders, tickets, and any other documents pertaining to shipping, receiving and transportation scrap materials; and**
- c. Copies of business records pertaining to sale, transfer, delivery or disposal of any hazardous substances, scrap materials, and /or recyclable materials to the Site.**
- d. If you are unable to provide any or all of these documents, explain why and what you did to find them.**

a-c. No documents were located responsive to Questions 21 a through c despite a diligent search of Company records.

d. To help in locating records, the Facility accounting records and waste management records were reviewed. This included a search of the Company's accounting system, ACS Software. The only information discovered in the accounting system is summarized above in response to Question 19. In addition, hard deposit records are at the Facility back to 2002, while hard copy invoices are available back to 1997. Based on the information in ACS, these records do not contain documents relating to transactions with Peck. In addition, records relating to shipments of waste are maintained at the Facility back to 1999. These records were searched, and no documents were discovered relating to Peck. The Company does not send any records off-site.

22. If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and requests for copies of documents, identify such person(s), identify the additional documents that they may have and describe any information related to these questions that they may have.

All current employees for whom there was a reasonable belief of knowledge related to waste disposal and recycling activities at the Facility during the relevant time frame were interviewed. Based on these interviews, and corporate records regarding prior employees, the following individuals may have additional information regarding these questions:

Elza Tyndall – Former Fleet Manager. Mr. Tyndall may currently reside in the area David Knittle – Former mechanic. Mr. Knittle is the individual who conducted repairs on equipment motors at the Site, and may have been employed by Peck upon leaving his employment at the Company. The Company is unaware of Mr. Knittle's whereabouts.

23. Provide details, including dates and materials involved, of all on-site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of scrap materials containing hazardous substances at the Site.

The Company, including all current personnel interviewed with regards to this response, is unaware of any spill or releases of hazardous substances at the Site that may have occurred during the processing of scrap materials, or at other times.

24. To the extent not identified in Question 1, identify all transactions or agreements for disposal in which your company gave, sold, or transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including copper-bearing material, and ash to the Site. In addition:

a. State the dates on which each such person may have given, sold transferred or delivered such material.

b. Describe the materials or items that may have been given, sold, transferred or delivered including the type of material, chemical content, physical state, quantity by volume and weight and other characteristics.

c. Describe the nature, including the chemical content, characteristics, physical state (e.g. solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement

d. State whether any of the hazardous substances identified in subpart c. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.

To the best of the Company's knowledge, no materials sold to Peck contained hazardous substances.

25. What other materials, if any, did your company send to the Site? (items/materials not covered in Question 24 above)?

a. Describe the purpose of each sale, transfer, or delivery of materials to the Site.

To the best of the Company's knowledge, only scrap metals listed in Question 1 were sold to Peck. All were solid in form.

26. Describe what was done to materials indicated in your response to Questions 24 & 25 above once they were brought to the Site including any further processing of materials.

The Company does not have any information regarding the processes utilized at the Site which may have been employed in the recycling of scrap metals.

27. Identify the person(s) who sold, transferred, delivered, and selected the Site as the location at which scrap materials from your company were to be disposed or treated.

a. Identify all documents mentioning these arrangements for disposal

b. Describe all efforts (i.e., site visits) taken by the person(s) identified in your response to Questions 25 above to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred or delivered to the Site.

Based on interviews with Company Personnel, it appears as if James L. King, Jr. made all decisions regarding the selection of vendors for scrap metal recycling up to approximately 2001. Unfortunately, Mr. King passed away in 2002. No documents have been discovered which mention the arrangement between the Company and Peck related to either the recycling of scrap material, the purchase of motors from Peck, or the repair work conducted by the Company at the Site. Typically, the Fleet Manager monitored the copper placed in the shed or trailer, and the roll-off container utilized for other scrap metal daily, and arranged for pickup or delivery of these materials to the vendors, as selected by Mr. King. The truck driver or Fleet Manager would receive the scale ticket from Peck, and would provide this form to accounting. Accounting would then await the check and settlement statement from Peck, and process payments.

The Company has no records indicating what efforts may have been taken to determine the ultimate fate of scrap metals sold to the Site.

28. For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to Questions 24 & 25 above? If so, identify the hazardous substances added and the person responsible for adding such hazardous substance.

a. Why were these hazardous substances added to the materials?

b. Describe the source of or the process that produced the materials described in your response to Questions 24 & 25.

The Company has not and does not make it a practice to mix hazardous materials with scrap metals. In fact, Company procedures have been in place to ensure that any hazardous substances are removed from scrap metals prior to recycling, such as the abatement of lead paint and asbestos, and the draining of any oil from scrap metal and used motors prior to sending such material for recycling. In addition, the various waste streams, particularly hazardous waste streams, have been and are maintained in separate areas and Company procedures ensure that these wastes remain segregated.

FFE ORIGINAL

29. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g. responsibility for the disposal, treatment, storage recycling or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker, indicate the dates of the individual's employment or contractual obligation (i.e. the dates indicating the length of the individual's tenure[s]), the nature of the individual's duties and responsibilities and a description of the type of environmental information that the individual would know).

James L. King, Jr. was responsible for scrap metal recycling until approximately 2001.

Lloyd Spivey has been responsible for scrap metal recycling from approximately 2001 to the present, and was responsible for the management and disposal of other wastes at the Facility from 1990 until 1996.

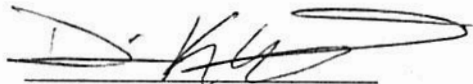
However, Jimmy Lee King has selected the vendors for copper recycling since approximately 2001.

Donald Lloyd Mabry has been responsible for hauling scrap metal from the Facility since the late 1970's, although scrap metal other than copper has typically been picked up at the Facility by the various vendors over this period.

Robert Stevens has been responsible for the management and disposal of other wastes at the Facility since 1996.

Elza Tyndall may have been responsible for the management and disposal of other wastes at the Facility prior to 1990.

Electric Motor & Contracting Co.
By Counsel



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1538 CBI ORIGINAL

REF NO	INV NO	INVT DTE	INV AMT	AMT PD	DISC	NET AMT
40914	P272700024	02/27/95	6,784.00	6,784.00	0.00	6,784.00

DETACH BEFORE DEPOSITING

NET CHECK \$6,784.00



PECK RECYCLING COMPANY

3220 DEEPWATER TERMINAL RD.
RICHMOND, VIRGINIA 23234-1838

CHECK NO.

0002938

68-7270/2560

DATE

CHECK AMOUNT

03/13/95

2938

*****6,784.00

PAY TO THE
ORDER OF

*****6,784 DOLLARS AND 00 CENTS

First Union National Bank
of Virginia
Oakton, VA 22124

ELECTRIC MOTOR & CONTRACTING
P.O. BOX 6747
CHESAPEAKE, VA 23323

RECYCLING ACCOUNT
VOID AFTER 60 DAYS

NON NEGOTIABLE

⑈002938⑈ ⑈25607270⑈ ⑈20799000⑈ ⑈7258⑈



PECK RECYCLING-PORTSMOUTH DIVISION, INC.

3500 Elm Avenue
Portsmouth, Virginia 23704-7199
(804) 399-4075
(804) 399-3949 - FAX

CBI ORIGINAL

SETTLEMENT

ELECTRIC MOTOR & CONTRACTING

P O BOX 6747
CHESAPEAKE, VA 23323

Print Date 2/27/95
Settlement# P272700024
Total Due You \$6,784.00
for

<u>Ticket#</u>	<u>Date</u>	<u>Lading/Inv#</u>	<u>Material</u>	<u>Net Wt. & UM</u>	<u>Unit Price</u>	<u>Ext. Price</u>
600436	2/3/95	65619	TIN & STEEL	5,240 H	2.000000	104.80
600446	2/6/95	65676	COPPER-MIXED/DIRTY/CONTAMINATED	10,120 P	0.660000	6,679.20

2 001 3320.00 6784.00
3 661 3315.00 (6784.00)
3 001 5000.00 6784.00

total 40919

VENDOR # 766024
INV. DATE 2/27/95
INVOICE # P272700024
ACCT. #
INV. AMT. 6784.00
DATE 3/9/95

"UM" refers to the Unit of Measure in the pricing your material.
P=Pounds, H=Hundred Weight, G=Gross Tons and N=Net Tons.

SCALE TICKET

PECK

Iron and Metal Co. Inc.

P. O. BOX 100
PORTSMOUTH, VA.
23703
Phone
399-4075

CBI ORIGINAL

Office and Railroad Yard: 3500-3850 Elm Avenue
PORTSMOUTH, VIRGINIA 23704

No 65619

DATE: 2/13 1995

NAME: Electric Motor 23462

Contracting 3730 600 KBL 102 Chs

MATERIAL	ON <input checked="" type="checkbox"/> OFF	
	PRICE	AMOUNT
MISC STY TIN + 3LUB	2.00	104.80
GROSS 212250 L.B 12:41 PM FE 03 95		
TARE 15720 L.B 12:50 PM FE 03 95		
NET 5240		
MATERIAL		
GROSS		
TARE		
NET		
MATERIAL		
GROSS		
TARE		
NET		
MATERIAL		
GROSS		
TARE		
NET		
MATERIAL		
GROSS		
TARE		
NET		

TOTAL

\$ 104.80

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....

PECK RECYCLING COMPANY RICHMOND, VA 23234-1838

REF NO INV NO INV DTE INV AMT
50535 8274700024 04/27/95 5,068.80

AMT PD DISC
5,068.80 0.00

NET AMT
5,068.80

CBI ORIGINAL

15,068.80

DETACH BEFORE DEPOSITING

NET CHECK



PECK RECYCLING COMPANY

3220 DEEPWATER TERMINAL RD.
RICHMOND, VIRGINIA 23234-1838

CHECK NO. 0004756

68-7270/2560

DATE

05/12/95

CHECK AMOUNT

4/56 *****5,068.80

*****5,068 DOLLARS AND 80 CENTS

PAY TO THE
ORDER OF

ELECTRIC MOTOR & CONTRACTING
P.O. BOX 6747
CHESAPEAKE VA 23323

First Union National Bank
of Virginia
Oakton, VA 22124

RECYCLING ACCOUNT
VOID AFTER 60 DAYS

NON NEGOTIABLE

⑈004756⑈ ⑈25607270⑈ ⑈20799000⑈ ⑈7258⑈



PECK RECYCLING-PORTSMOUTH DIVISION, INC.

3500 Elm Avenue
Portsmouth, Virginia 23704-7199
(804) 399-4075
(804) 399-3949 - FAX

CBI ORIGINAL

SETTLEMENT

ELECTRIC MOTOR & CONTRACTING

P O BOX 6747
CHESAPEAKE, VA 23323

Print Date 4/27/95
Settlement# P274700024
Total Due You \$5,068.80
for

<u>Ticket#</u>	<u>Date</u>	<u>Lading/Inv#</u>	<u>Material</u>	<u>Net Wt. & UM</u>	<u>Unit Price</u>	<u>Ext. Price</u>
600897	4/19/95	67137	CONTAMINATED COPPER	7,680 P	0.660000	5,068.80

2 001	3320.000	5068.80
3 001	3315.000	<5068.80>
3 001	5000.000	5068.80

INVOICE	P274700024
VOUCHER #	50539
ENTERED BY	AS
DATE	5/8/95

"UM" refers to the Unit of Measure in the pricing your material.
P=Pounds, H=Handed Weight, G=Gross Tons and N=Net Tons.

SCALE TICKET

PECK Iron and Metal Co. Inc.

Office and Railroad Yard: 3500-3850 Elm Avenue
PORTSMOUTH, VIRGINIA 23704

P. O. BOX 100
PORTSMOUTH, VA.
23705
Phone
399-4075

No 67137

CBI ORIGINAL

DATE: 4/19/95

NAME: ELECTRIC MOTOR & CONTRACTING

DIRTY COPPER 2025 ON. OFF

MATERIAL TARE AMOUNT

28600 LB GROSS 01:42 PM AP 19 95

14220 LB TARE 01:42 PM AP 19 95

7680 ✓ NET

MATERIAL

GROSS

TARE 164

NET

MATERIAL

GROSS

600897 TARE

NET

MATERIAL

GROSS

TARE

NET

TOTAL 5068.80

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....

INV DTE	INV AMT	AMT PD	BIDC	NET AMT
24 01/31/95	5,872.90	5,872.90	0.00	0.00

RE DEPOSITING

NET CHECK



PECK RECYCLING COMPANY

3220 DEEPWATER TERMINAL RD.
RICHMOND, VIRGINIA 23234-1838

CHECK NO. **0003706**

68-7270/2560

DATE

CHECK AMOUNT

04/10/95 3706 *****5,872.90

*****5,872 DOLLARS AND 90 CENTS

18 of Virginia
Oakton, VA 22124

ELECTRIC MOTOR & CONTRACTING
P.O. BOX 8747
CHESAPEAKE VA 23323

RECYCLING ACCOUNT
VOID AFTER 60 DAYS

NON NEGOTIABLE

⑈003706⑈ ⑆25607270⑆ 2079900017258⑈



PECK RECYCLING-PORTSMOUTH DIVISION, INC.

3500 Elm Avenue
Portsmouth, Virginia 23704-7199
(804) 399-3075
(804) 399-3949 - FAX

3700 FBI ORIGINAL

SETTLEMENT

ELECTRIC MOTOR & CONTRACTING

P O BOX 6747
CHESAPEAKE, VA 23323

Print Date 3/31/95
Settlement# P313700024
Total Due You \$5,872.90
for

<u>Ticket#</u>	<u>Date</u>	<u>Lading/Inv#</u>	<u>Material</u>	<u>Net Wt. # UM</u>	<u>Unit Price</u>	<u>Ext. Price</u>
600648	3/7/95	66318	UNPREPARED STEEL	14,740 H	2.500000	368.50
600701	3/14/95	66466	CONTAMINATED COPPER	8,340 P	0.660000	5504.40

2 001 3320.000 5872.90
3 001 3315.000 <5872.90>
3 001 5000.000 5872.90

INVOICE # P313700024
VOUCHER # 46106
ENTERED BY NS
DATE 4/10/95

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P=Pounds, H=Hundred Weight, G=Gross Tons and N=Net Tons.

CBI ORIGINAL

SCALE TICKET
PECK Iron and Metal Co. Inc.
 P. O. BOX 100
 PORTSMOUTH, VA. 23705
 Phone 399-4075
 Office and Railroad Yard: 3500-3850 Elm Avenue
 PORTSMOUTH, VIRGINIA 23704
 No 66318

DATE: 3/19/95
 NAME: Electric Motor + 1
 Contracting

MATERIAL	ON	OFF
WRAP STEEL	PRICE 250	AMOUNT
11120 LB GROSS	MR 07 95	
15350 LB GROSS	MR 07 95	
14740	NET	36850
MATERIAL		
	GROSS	
	TARE	
	NET	
MATERIAL		
	GROSS	
	TARE	
	NET	
MATERIAL		
600648	GROSS	
	TARE	
	NET	

TOTAL 36850

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....

SCALE TICKET
PECK Iron and Metal Co. Inc.
 P. O. BOX 100
 PORTSMOUTH, VA. 23705
 Phone 399-4075
 Office and Railroad Yard: 3500-3850 Elm Avenue
 PORTSMOUTH, VIRGINIA 23704
 No 66466

DATE: 3/14/95
 NAME: Electric Motor + 1
 Contracting

MATERIAL	ON	OFF
WRAP + INSULATED	PRICE	AMOUNT
23700 LB GROSS	MR 14 95	
15340 LB GROSS	MR 14 95	
8340	NET	6066
MATERIAL		
	GROSS	
	TARE	
	NET	
MATERIAL		
	GROSS	
	TARE	
	NET	
MATERIAL		
600701	GROSS	
	TARE	
	NET	

TOTAL 6,504.40

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....

PECK RECYCLING COMPANY RICHMOND, VA 23234-1838

REF NO INV NO ~~INV~~ DTE INV AMT
38921 P311700024 01/31/95 5,177.30

AMT PD DIST
5,177.30 0.00

REF AMT
5,177.30

CBI ORIGINAL

5,177.30

DETACH BEFORE DEPOSITING

NET CHECK



PECK RECYCLING COMPANY

3220 DEEPWATER TERMINAL RD.
RICHMOND, VIRGINIA 23234-1838

DATE

02/08/95

CHECK NO.

0001933

68-7270/2560

CHECK AMOUNT

1933 *****5,177.30

*****5,177 DOLLARS AND 30 CENTS

First Union National Bank
of Virginia
Oakton, VA 22124

PAY TO THE
ORDER OF

ELECTRIC MOTOR & CONTRACTING
P.O. BOX 6747
CHESAPEAKE VA 23323

RECYCLING ACCOUNT
VOID AFTER 60 DAYS

NON NEGOTIABLE

⑈001933⑈ ⑆25807270⑆ ⑆2074900017258⑈



PECK RECYCLING-PORTSMOUTH DIVISION, INC.

3500 Elm Avenue
Portsmouth, Virginia 23704-7199
(804) 399-4075
(804) 399-3949 - FAX

CBI ORIGIN.

SETTLEMENT

ELECTRIC MOTOR & CONTRACTING

P O BOX 6747
CHESAPEAKE, VA 23323

Print Date 1/31/95
Settlement# P311700024
Total Due You \$5,177.30
for

<u>Ticket#</u>	<u>Date</u>	<u>Lading/Inv#</u>	<u>Material</u>	<u>Net Wt. # UM</u>	<u>Unit Price</u>	<u>Ext. Price</u>
600238	1/11/95	65051	COPPER-MIXED/DIRTY/CONTA MINATED	7,080 P	0.660000	4,672.80
600397	1/26/95	65448	STEEL	20,180 H	2.500000	504.50

2 001 3320000 5177.30
3 001 3315,000 <5177.30>
3 001 5000.000 5177.30

P311700024
ref # 36922
Entered 2/8/95
72

"UM" refers to the Unit of Measure in the pricing your material.
P=Pounds, H=Hundred Weight, G=Gross Tons and N=Net Tons.

700024

SCALE TICKET

PECK*Iron and Metal Co. Inc.*Office and Railroad Yard: 3500-3850 Elm Avenue
PORTSMOUTH, VIRGINIA 23704P. O. BOX 100
PORTSMOUTH, VA.
23705
Phone
399-4073

No 65051

DATE: 1/11/19

NAME: Electric Motor & Contractions

MATERIAL	ON	PRICE	AMOUNT	OFF
INSULATION & Fiberglass	JA 1	95		
22600 LB 01:00	JA 11	95		
7080	NET	166		
MATERIAL				
	GROSS			
	TARE			
	NET			
MATERIAL				
	GROSS			
	TARE			
	NET			
MATERIAL				
	GROSS			
	TARE			
	NET			
600238	NET			

TOTAL ▶ 4672.80

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....

SCALE TICKET

PECK*Iron and Metal Co. Inc.*Office and Railroad Yard: 3500-3850 Elm Avenue
PORTSMOUTH, VIRGINIA 23704P. O. BOX 100
PORTSMOUTH, VA.
23705
Phone
399-4073

No 65448

DATE: 1/26/19

NAME: Electric Motor & Contractions Steel

MATERIAL	ON	PRICE	AMOUNT	OFF
Steel & Shipped	JA 26	95		
Electric Motor	JA 26	95		
55400 LB 11:54	JA 26	95		
10220 LB 12:12	JA 26	95		
20180	NET	2.50/cwt		
MATERIAL				
	GROSS			
	TARE			
	NET			
MATERIAL				
	GROSS			
	TARE			
	NET			
MATERIAL				
600397	GROSS			
	TARE			
	NET			

TOTAL ▶ 504.50

I certify that I am the legal owner of the above material, for which I acknowledge receipt of full payment.

Signed.....